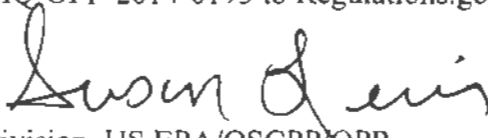



**EPA REGISTRATION NUMBER 62719-649 – VOL. 1**

## Posting an FDMS Docket without a Federal Register Notice

### MEMORANDUM

**SUBJECT:** Posting EPA-HQ-OPP-2014-0195 to Regulations.gov for Public Access

**FROM:** Susan Lewis  
Director  
Registration Division, US EPA/OSCP/OPP  
Signature: 

**Thru:** Kathryn V. Montague  
Product Manager 23  
Herbicide Branch, Registration Division, US EPA/OSCP/OPP  
Signature: 

Due to a request from the Center for Food Safety, EPA is extending the comment period associated with the proposed expansion of the registration of Enlist Duo to ten additional states (Arkansas, Kansas, Louisiana, Minnesota, Missouri, Mississippi, Nebraska, Oklahoma, Tennessee, and North Dakota) to December 15<sup>th</sup>, 2014. This request has been granted to allow commenters sufficient time to review the technical document related to this action, *Addendum to 2,4-D Choline Salt Section 3 Risk assessment: Refined Endangered Species Assessment for Proposed New Uses on Herbicide-Tolerant Corn and Soybean for AR, KS, LA, MN, MS, MO, NE, ND, OK, TN*. This memorandum authorizes extension of the public comment period.

Submit your comments, identified by Docket ID No. EPA-HQ-OPP-2014-0195, by one of the following methods:

- [www.regulations.gov](http://www.regulations.gov): Follow the on-line instructions for submitting comments.
- Mail: 2,4-D: New Use on Herbicide-Tolerant Corn and Soybean, Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Ave, NW, Washington, DC 20460.
- Hand Delivery: Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Avenue, NW, Washington, DC 20460. Such deliveries are only accepted during the Docket's normal hours of operation, and special arrangements should be made for deliveries of boxed information. To make special arrangements for hand delivery or delivery of boxed materials, please follow the instructions at <http://www.epa.gov/dockets/contacts.htm>.

EPA's policy is that all comments received will be included in the public docket without change and may be made available online at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be

Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through <http://www.regulations.gov> or e-mail. The <http://www.regulations.gov> Web site is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through <http://www.regulations.gov>, your e-mail address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, avoid any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket, visit the EPA Docket Center homepage at <http://www.epa.gov/epahome/dockets.htm>.

Should you have any questions regarding this memorandum, please contact Emily Schmid at (703) 347-0189, or email at [schmid.emily@epa.gov](mailto:schmid.emily@epa.gov).



## CENTER FOR FOOD SAFETY

October 21, 2014

Administrator Gina McCarthy  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

CC: submitted to regulations.gov

Docket ID Number: Docket No. EPA-HQ-OPP-2014-0195

RE: *EPA's proposed regulatory decision to register Enlist Duo herbicide for use on Dow AgroSciences' 2,4-D-tolerant Enlist corn and soy (09-233-01p, 09-349-01p, and 11-234-01p) in Arkansas, Kansas, Louisiana, Minnesota, Missouri, Mississippi, Nebraska, Oklahoma, Tennessee and North Dakota.*

Dear Administrator McCarthy,

We respectfully request a 60 day extension for the public comment period for Docket ID EPA-HQ-OPP-2014-0195 regarding the proposed regulatory decision to register Enlist Duo herbicide for use on Dow AgroSciences' 2,4-D-tolerant Enlist corn and soy (09-233-01p, 09-349-01p, and 11-234-01p) in Arkansas, Kansas, Louisiana, Minnesota, Missouri, Mississippi, Nebraska, Oklahoma, Tennessee and North Dakota. We believe the current length of time designated for comment is inadequate and should be extended 60 days to allow for meaningful public participation.

These regulatory decisions are particularly important given the extensive public interest in, and controversial nature of, genetically engineered (GE) crops. Center for Food Safety (CFS) represents over half a million members across the country who are very concerned about the potential environmental, human health and agronomic impacts of GE crops and foods. As such, a meaningful comment period is essential to address the concerns of a very large cross section of our country's citizens.

The GE crops recently deregulated and their corresponding herbicide package, Enlist Duo, raise novel concerns that require careful assessment. 2,4-D is the 7th largest source of dioxins in the U.S., and along with other herbicides of its class, has been independently associated with deadly immune system cancers, Parkinson's disease, endocrine disruption, and reproductive problems, with children at particular risk. EPA's assessment of Enlist Duo failed to correctly account for exposure in children, one of numerous flaws in the published analysis.

#### NATIONAL HEADQUARTERS

660 Pennsylvania Avenue, SE, Suite 302  
Washington, D.C. 20003  
T: 202-547-9359 F: 202-547-9429

#### CALIFORNIA OFFICE

303 Sacramento Street, 2nd Floor  
San Francisco, CA 94111  
T: 415-826-2770 F: 415-826-0507

#### PACIFIC NORTHWEST OFFICE

917 SW Oak Street, Suite 300  
Portland, OR 97205  
T: 971-271-7372 F: 971-271-7374

#### HAWAII OFFICE

677 Ala Moana Blvd, Suite 1100  
Honolulu, HI 96813  
T: 808-687-0087

[office@centerforfoodsafety.org](mailto:office@centerforfoodsafety.org)

[centerforfoodsafety.org](http://centerforfoodsafety.org)

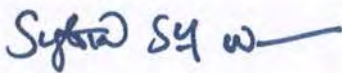


Further, additional species will likely be impacted by registration of Enlist Duo in the additional ten states proposed, including the sandhill crane, which notoriously eats corn seedlings, and other species affected by habitat destruction. The in part novel concerns raised by these GE crops make it still more essential that adequate time is allotted for informed public comment.

We are confident that EPA understands the value of stakeholder feedback to help inform its decisions. There are a number of highly technical supporting documents in the docket, and the current 30 day comment period is much too short to permit careful analysis.

Given the unprecedented public interest in the deregulation of GE crop and herbicide systems, the numerous serious issues they raise, and the length and technical complexity of the numerous supporting documents under consideration by the public, it is imperative that the comment period be extended by 60 days to provide for meaningful public input. This extension would ensure that stakeholders are able to thoroughly review EPA's proposed regulatory decisions and provide thoughtful comments. We appreciate your consideration and support of this request.

Respectfully Submitted,



Sylvia Wu  
Staff Attorney

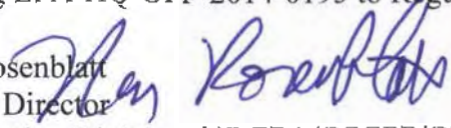


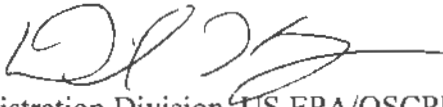
Colin O'Neil  
Director of Government Affairs

## Posting an FDMS Docket without a Federal Register Notice

### MEMORANDUM

**SUBJECT:** Posting EPA-HQ-OPP-2014-0195 to Regulations.gov for Public Access

**FROM:** Dan Rosenblatt  
Acting Director  
Registration Division, US EPA/OSCP/OPP  
Signature: 

**Thru:** Kathryn V. Montague  
Product Manager 23  
Herbicide Branch, Registration Division, US EPA/OSCP/OPP  
Signature: 

EPA is opening a 30 day comment period for the public to submit comments regarding the registration of Enlist Duo in additional states. EPA is registering the pesticide in six states: Illinois, Indiana, Iowa, Ohio, South Dakota and Wisconsin. The Agency is accepting comments until November 14, 2014 (30 days) on whether to register Enlist Duo in ten more states: Arkansas, Kansas, Louisiana, Minnesota, Missouri, Mississippi, Nebraska, Oklahoma, Tennessee and North Dakota.

Submit your comments, identified by Docket ID No. EPA-HQ-OPP-2014-0195, by one of the following methods:

- [www.regulations.gov](http://www.regulations.gov): Follow the on-line instructions for submitting comments.
- Mail: 2,4-D: New Use on Herbicide-Tolerant Corn and Soybean, Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Ave, NW, Washington, DC 20460.
- Hand Delivery: Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Avenue, NW, Washington, DC 20460. Such deliveries are only accepted during the Docket's normal hours of operation, and special arrangements should be made for deliveries of boxed information. To make special arrangements for hand delivery or delivery of boxed materials, please follow the instructions at <http://www.epa.gov/dockets/contacts.htm>.

EPA's policy is that all comments received will be included in the public docket without change and may be made available online at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through <http://www.regulations.gov> or e-mail. The <http://www.regulations.gov>

Web site is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through <http://www.regulations.gov>, your e-mail address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, avoid any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket, visit the EPA Docket Center homepage at <http://www.epa.gov/epahome/dockets.htm>.

Should you have any questions regarding this memorandum, please contact Emily Schmid at (703) 347-0189, or email at [schmid.emily@epa.gov](mailto:schmid.emily@epa.gov).



Dow AgroSciences

MRID: 49431200

Dow AgroSciences LLC  
9330 Zionsville Road Indianapolis, IN 46268 USA

www.dowagro.com

308/2E  
July 28, 2014

Document Processing Desk (APPL/PETN/E-SUB)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

2,4-D (AI: 2,4-DICHLOROPHENOXYACETIC ACID)  
EPA REGISTRATION NUMBER 62719-23 **400**  
2,4-D COTTON PETITION FOR TOLERANCE AND NOTICE OF FILING  
SUBMISSION OF AMENDED MAIN LABELING

Dow AgroSciences is respectfully submitting an application for the establishment of a new tolerance for 2,4-D in cotton and for the respective label amendments. The establishment of a new 2,4-D tolerance in cotton will allow 2,4-D to be used in the GF-2726 formulation for the control of emerged annual and perennial weeds in Enlist™ Cotton fields. GF-2726 is an effective broad spectrum herbicide exclusive for use in Enlist™ crops as preplant or preemergence or postemergence herbicide treatment.

Dow AgroSciences is submitting this submission electronically (e-PRISM.xml label amendment for 2,4-D Acetic Acid Herbicide).

- CD containing e-PRISM.xml – Label Amendment Submission as follows:
  - Transmittal document (this letter)
  - Complimentary Copy, Pay Gov Confirmation (Tracking ID: 25GQS7L3)
  - Complimentary Copy, Pay Gov Confirmation (Tracking ID: 25GL6DR6)
  - Application for Pesticide, EPA Form 8570-1
  - EPA Form 8570-27, Formulator's Exemption for [REDACTED]
  - EPA Form 8570-27, Formulator's Exemption for [REDACTED]
  - EPA Form 8570-27, Formulator's Exemption for [REDACTED]
  - EPA Form 8570-34, Certification with Respect to Citation of Data
  - EPA Form 8570-35, Data Matrix for 2,4-D – Agency Copy (12 Pages)

©™ Trademark of Dow AgroSciences LLC

\*Product ingredient source information may be entitled to confidential treatment\*

Page 2

- EPA Form 8570-35, Data Matrix for 2,4-D – Public Copy (12 Pages)
- EPA Form 8570-35, Data Matrix for GF-2726 – Agency Copy (17 Pages)
- EPA Form 8570-35, Data Matrix for GF-2726 – Public Copy (17 Pages)
- Label entitled 2,4-Dichlorophenoxy Acetic Acid Flake (K1A / 2,4-Dichlorophenoxy Acetic Acid Flake / Amend / 07-24-14)  
 (4 pages plus Registrations Notes) (062719-00025.20140724.2,4-Dichlorophenoxy Acetic Acid Flake-025 24Jul14d)
- Label entitled GF-2726 (P2E / GF-2726 / Prop Sec 3 / 07-08-14)  
 (19 pages plus Registrations Notes) (062719-xxxxx.20140708.GF-2726-AUO 08Jul14d)
- Petition for Tolerance  
 (1 e-copy Tolerance Petition in PDF format)
- Notice of Filing Pesticide Tolerance Petition Filing dated July 25, 2014  
 (1 e-copy NOF in Word format)

<u>Volume</u> <u>Guideline No.</u>	<u>MRID NO.</u>	<u>Study</u>
Volume #2 360.1300	49431201	Rationale for not requiring an NOR for 2,4-D applied to AAD-12 Cotton Author(s): Rotondaro, S.L. 06-Feb-2014  Study ID: 140189 Pages: 1-16 (1 PDF copy)
Volume #3 860.1380	49431202	Frozen Storage Stability of Residues of 2,4-D and 2,4-DCP in Transgenic Cotton and Its Processed Fractions Containing the Aryloxyalkanoate Dioxygenase-12 ( <i>aad-12</i> ) Gene Author(s): Gesell, J.T.; Smith, K.A. 17-Feb-2014  Study ID: 130518 Pages: 1-89 (1 PDF copy)
Volume #4 860.1500	49431203	MAGNITUDE OF 2,4-D RESIDUE IN/ON TRANSGENIC COTTON CONTAINING THE ARYLOXYALKANOATE DIOXYGENASE-12 ( <i>aad-12</i> ) GENE – RESIDUE AND DECLINE STUDY Author(s): Vespestad, D. 10-Apr-2014  Study ID: 120430 Pages: 1-335 (1 PDF copy)
Volume #5 860.1520	49431204	MAGNITUDE OF THE RESIDUE OF 2,4-D IN/ON TRANSGENIC COTTON CAINTING THE ARYLOXYALKANOATE DIOXYGENASE-12 ( <i>aaa-12</i> ) GENE, PROCESSING STUDY Author(s): Vespestad, D. 26-Feb-2014  Study ID: 120431 Pages: 1-89 (1 PDF copy)

Kathryn Montague/PM-23 (7505P)  
2,4-D (AI: 2,4-DICHLOROPHENOXYACETIC ACID)  
EPA REGISTRATION NUMBER: 62719-25  
2,4-D COTTON PETITION FOR TOLERANCE AND NOTICE OF FILING  
SUBMISSION OF AMENDED MAIN LABELING  
July 28, 2014

Page 3

Volume #5  
N/A

49431205

Public Interest Document Supporting the Registration of 2,4-D on  
Herbicide Tolerant Enlist Cotton (DAS-81910-7) to Improve the  
Performance of Current Weed Control Systems and Provide New  
Weed Resistance Management Options  
Author(s): Nelson, J

15-Jul-2014

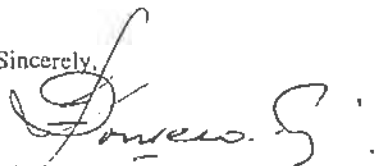
Study ID: Jul1514

Pages: 1-157

(1 PDF copy)

Your EPA PRIA confirmation can be sent to [priatracking@dow.com](mailto:priatracking@dow.com). If you require additional information, please contact Nestor Algarin, Regulatory Specialist at 317-337-5148 ([nalgarin@dow.com](mailto:nalgarin@dow.com)), or Kerri Hipsky, Registration Assistant for this product, at 317-337-7827 ([kahipsky@dow.com](mailto:kahipsky@dow.com)).

Sincerely,



Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
[dfonseca@dow.com](mailto:dfonseca@dow.com)

Enclosures



## Schmid, Emily

---

**From:** Montague, Kathryn V.  
**Sent:** Tuesday, July 15, 2014 3:49 PM  
**To:** Khan, Faruque  
**Cc:** Sankula, Sujatha; Schmid, Emily; Meadows, Sarah; Kenny, Daniel  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)  
**Attachments:** AB11004-75.txt; AB11006-30.txt; AB11006-40.txt; AB11006-75.txt; AI11004-30.txt; AI11004-40.txt; AI11004-60.txt; AI11004-100.txt; AI11006-30.txt; AI11006-40.txt; AI11006-60.txt; AI11006-100.txt; AI11008-30.txt; AI11008-40.txt; AI11008-60.txt; AI11008-70.txt; AI11008-80.txt; AITTJ6011004-20.txt; AITTJ6011004-40.txt; AITTJ6011004-55.txt; AITTJ6011006-20.txt; AITTJ6011006-40.txt; AITTJ6011006-65.txt; AIXR11003-30.txt; AIXR11003-40.txt; AIXR11004-15.txt; AIXR11004-40.txt; AIXR11004-70.txt; AIXR11006-15.txt; AIXR11006-40.txt; AIXR11006-70.txt; AIXR110025-30.txt; AIXR110025-40.txt; AM11004-15.txt; AM11004-40.txt; AM11004-55.txt; AM11006-15.txt; AM11006-40.txt; AM11006-65.txt; Duo\_base.ag; GA11004-15.txt; GA11004-40.txt; GA11004-55.txt; GA11005-15.txt; GA11005-40.txt; ID11004-30.txt; ID11004-40.txt; ID11004-55.txt; ID11004-95.txt; ID11005-30.txt; ID11005-40.txt; ID11005-60.txt; ID11005-100.txt; MD11004-10.txt; MD11004-40.txt; MD11004-55.txt; MD11005-10.txt; MD11005-40.txt; MD11005-55.txt; MR11004-30.txt; MR11004-40.txt; MR11004-45.txt; MR11006-30.txt; MR11006-40.txt; MR11006-60.txt; MR11006-80.txt; MR11008-30.txt; MR11008-40.txt; MR11008-50.txt; MR11008-60.txt; MR11008-80.txt; TDXL11003-30.txt; TDXL11003-40.txt; TDXL11003-60.txt; TDXL11004-30.txt; TDXL11004-40.txt; TDXL11004-45.txt; TDXL11004-60.txt; TDXL11004-70.txt; TDXL11006-30.txt; TDXL11006-40.txt; TDXL11006-65.txt; TDXL11006-75.txt; TDXL-D11003-30.txt; TDXL-D11003-40.txt; TDXL-D11003-90.txt; TDXL-D11004-30.txt; TDXL-D11004-40.txt; TDXL-D11004-90.txt; TDXL-D11006-30.txt; TDXL-D11006-40.txt; TDXL-D11006-100.txt; TDXL-D11008-30.txt; TDXL-D11008-40.txt; TDXL-D11008-80.txt; TTI11004-15.txt; TTI11004-40.txt; TTI11004-85.txt; ULD12003-30.txt; ULD12003-40.txt; ULD12003-50.txt; ULD12004-15.txt; ULD12004-40.txt; ULD12004-60.txt; ULD12004-70.txt; ULD12004-95.txt; ULD12006-15.txt; ULD12006-40.txt; ULD12006-50.txt; ULD12006-65.txt; ULD12008-15.txt; ULD12008-40.txt; ULD12008-55.txt; ULD120025-15.txt; ULD120025-40.txt; ULD120025-65.txt; XR11004-15.txt; XR11004-40.txt; XR11004-45.txt; XR11006-15.txt; XR11006-40.txt; XR11006-60.txt; AB11004-30.txt; AB11004-40.txt

Hi, Faruque,

DAS data per your discussions with Pat Havens. Additional information is also coming, which I will forward as soon as I receive it.

Thanks,  
Kay

**From:** Fonseca, Diego (D) [mailto:[dfonseca@dow.com](mailto:dfonseca@dow.com)]  
**Sent:** Tuesday, July 15, 2014 3:16 PM  
**To:** Montague, Kathryn V.  
**Subject:** RE: EPA Registration No. 62719-AUO (GF-2726)

Let's try this way, I mean the same 124 files but unzipped. Please confirm if it works fine this time. Thanks,

*Diego Fonseca* Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

Dow AgroSciences LLC





---

**From:** Montague, Kathryn V. [<mailto:Montague.Kathryn@epa.gov>]  
**Sent:** Tuesday, July 15, 2014 1:53 PM  
**To:** Fonseca, Diego (D)  
**Subject:** RE: EPA Registration No. 62719-AUO (GF-2726)

Hi, Diego,

The ZIP file will not come through our firewall...is there another way you can send it?

Thanks,  
Kay

---

**From:** Fonseca, Diego (D) [<mailto:dfonseca@dow.com>]  
**Sent:** Tuesday, July 15, 2014 11:01 AM  
**To:** Montague, Kathryn V.  
**Cc:** Schmid, Emily; Meadows, Sarah; Kenny, Daniel; Havens, Patrick (PL)  
**Subject:** RE: EPA Registration No. 62719-AUO (GF-2726)

Hi Kay. Please find attached a zip file containing 124 files that should be send to Faruque Khan as soon as possible. Attachment includes:

- Duo\_base.ag – AGDISP input file used for all near-field simulations.
- 123 text files (\*.txt) – mean cumulative spray droplet distributions for each treatment of GF-2726 in the UNL low-speed wind tunnel. These were imported into the AGDISP User Library and used as the DSD's for each near-field simulation.

Pat Havens prepared information in the attachment as agreed directly with Faruque. Additional information on the droplet spectra, also agreed with Faruque, is currently in preparation and will be sent shortly.

Sincerely,

*Diego Fonseca* Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

Dow AgroSciences LLC



---

**From:** Kenny, Daniel [<mailto:Kenny.Dan@epa.gov>]  
**Sent:** Monday, July 07, 2014 3:47 PM  
**To:** Fonseca, Diego (D)  
**Cc:** Montague, Kathryn V.; Schmid, Emily; Meadows, Sarah  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

Hi Diego. Please see below request from EFED regarding the nozzle data. Is this something that you would have quick access to? Also, did DAS still want to submit the ESA that John Cuffe and Bruce Houtman discussed at the meeting with Jack Housenger?

Thanks very much,  
Dan Kenny

---

**From:** Sankula, Sujatha  
**Sent:** Monday, July 07, 2014 3:30 PM  
**To:** Montague, Kathryn V.; Kenny, Daniel  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

fyi

---

**From:** Khan, Faruque  
**Sent:** Thursday, July 03, 2014 3:46 PM  
**To:** Kenny, Daniel  
**Cc:** Sankula, Sujatha; Radtke, Meghan  
**Subject:** RE: EPA Registration No. 62719-AUO (GF-2726)

Hi Dan,  
During my cursory review of DOW submission related to WT study I did not see graphical outputs of Sympatec Helos/Vario KR laser diffraction particle size analyzer in the draft report. Please contact Dow to provide graphical outputs of Sympatec Helos/Vario KR laser diffraction for review. These outputs are critical to do QA/QC. I would also like to have electronic files of calculation (if possible) used in the report and inputs files used in AGDISP modeling to cross check deposition profiles of various nozzles. Input files will help us to review efficiently.

Happy July 4<sup>th</sup>  
Faruque

---

**From:** Sankula, Sujatha  
**Sent:** Wednesday, July 02, 2014 7:57 AM  
**To:** Radtke, Meghan; Khan, Faruque  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

Faruque



Please take a look at this info asap. I am sure Jim will ask us about this next week.

Meghan

Let us make this a priority for Faruque for this week.

---

**From:** Kenny, Daniel  
**Sent:** Tuesday, July 01, 2014 7:30 PM  
**To:** Sankula, Sujatha  
**Cc:** Montague, Kathryn V.; Schmid, Emily; Meadows, Sarah  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

Hi Sujatha. Here is the wind tunnel/nozzle study that we were expecting from Dow. We'll work up a bean as soon as it works up through the system, but in the meantime, we can work off of the courtesy copy.

Thanks,  
Dan

---

**From:** Fonseca, Diego (D) [<mailto:dfonseca@dow.com>]  
**Sent:** Tuesday, July 01, 2014 4:08 PM  
**To:** Kenny, Daniel  
**Cc:** Montague, Kathryn V.; Schmid, Emily  
**Subject:** EPA Registration No. 62719-AUO (GF-2726)

Dear Dan, please see attached a complimentary copy of the study report "Low-Speed Wind Tunnel Droplet Size Spectrum Determinations with GF-2726", which was requested by the Agency in order to qualify nozzles for the application of GF-2726 (Enlist™ Duo). The Modeling with AGDISP Ground has been added in Appendix D, as requested by EFED last June 17. I also want to communicate that today, this study report is being submitted to EPA's Front End with MRID No. 49384801.

For any question on this regard, please do not hesitate to contact me.

Sincerely,

*Diego Fonseca* Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)

 **Dow AgroSciences** | Solutions for the Growing World

## Schmid, Emily

---

**From:** Fonseca, Diego (D) <dfonseca@dow.com>  
**Sent:** Tuesday, July 15, 2014 11:01 AM  
**To:** Montague, Kathryn V.  
**Cc:** Schmid, Emily; Meadows, Sarah; Kenny, Daniel; Havens, Patrick (PL)  
**Subject:** RE: EPA Registration No. 62719-AUO (GF-2726)  
**Attachments:** removed.txt

Hi Kay. Please find attached a zip file containing 124 files that should be send to Faruque Khan as soon as possible. Attachment includes:

- Duo\_base.ag – AGDISP input file used for all near-field simulations.
- 123 text files (\*.txt) – mean cumulative spray droplet distributions for each treatment of GF-2726 in the UNL low-speed wind tunnel. These were imported into the AGDISP User Library and used as the DSD's for each near-field simulation.

Pat Havens prepared information in the attachment as agreed directly with Faruque. Additional information on the droplet spectra, also agreed with Faruque, is currently in preparation and will be sent shortly.

Sincerely,

*Diego Fonseca* Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



---

**From:** Kenny, Daniel [mailto:Kenny.Dan@epa.gov]  
**Sent:** Monday, July 07, 2014 3:47 PM  
**To:** Fonseca, Diego (D)  
**Cc:** Montague, Kathryn V.; Schmid, Emily; Meadows, Sarah  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

Hi Diego. Please see below request from EFED regarding the nozzle data. Is this something that you would have quick access to? Also, did DAS still want to submit the ESA that John Cuffe and Bruce Houtman discussed at the meeting with Jack Housenger?



Thanks very much,  
Dan Kenny

---

**From:** Sankula, Sujatha  
**Sent:** Monday, July 07, 2014 3:30 PM  
**To:** Montague, Kathryn V.; Kenny, Daniel  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

fyi

---

**From:** Khan, Faruque  
**Sent:** Thursday, July 03, 2014 3:46 PM  
**To:** Kenny, Daniel  
**Cc:** Sankula, Sujatha; Radtke, Meghan  
**Subject:** RE: EPA Registration No. 62719-AUO (GF-2726)

Hi Dan,  
During my cursory review of DOW submission related to WT study I did not see graphical outputs of Sympatec Helos/Vario KR laser diffraction particle size analyzer in the draft report. Please contact Dow to provide graphical outputs of Sympatec Helos/Vario KR laser diffraction for review. These outputs are critical to do QA/QC. I would also like to have electronic files of calculation (if possible) used in the report and inputs files used in AGDISP modeling to cross check deposition profiles of various nozzles. Input files will help us to review efficiently.  
Happy July 4<sup>th</sup>  
Faruque

---

**From:** Sankula, Sujatha  
**Sent:** Wednesday, July 02, 2014 7:57 AM  
**To:** Radtke, Meghan; Khan, Faruque  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

Faruque

Please take a look at this info asap. I am sure Jim will ask us about this next week.

Meghan

Let us make this a priority for Faruque for this week.

---

**From:** Kenny, Daniel  
**Sent:** Tuesday, July 01, 2014 7:30 PM  
**To:** Sankula, Sujatha  
**Cc:** Montague, Kathryn V.; Schmid, Emily; Meadows, Sarah  
**Subject:** FW: EPA Registration No. 62719-AUO (GF-2726)

Hi Sujatha. Here is the wind tunnel/nozzle study that we were expecting from Dow. We'll work up a bean as soon as it works up through the system, but in the meantime, we can work off of the courtesy copy.

Thanks,  
Dan

**From:** Fonseca, Diego (D) [<mailto:dfonseca@dow.com>]  
**Sent:** Tuesday, July 01, 2014 4:08 PM  
**To:** Kenny, Daniel  
**Cc:** Montague, Kathryn V.; Schmid, Emily  
**Subject:** EPA Registration No. 62719-AUO (GF-2726)

Dear Dan, please see attached a complimentary copy of the study report "Low-Speed Wind Tunnel Droplet Size Spectrum Determinations with GF-2726", which was requested by the Agency in order to qualify nozzles for the application of GF-2726 (Enlist™ Duo). The Modeling with AGDISP Ground has been added in Appendix D, as requested by EFED last June 17. I also want to communicate that today, this study report is being submitted to EPA's Front End with MRID No. 49384801.

For any question on this regard, please do not hesitate to contact me.

Sincerely,

*Diego Fonseca* Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



## Schmid, Emily

---

**From:** Montague, Kathryn V.  
**Sent:** Monday, July 14, 2014 4:22 PM  
**To:** Schmid, Emily; Meadows, Sarah  
**Subject:** FW: Example of Sympatec Laser particle Size Analyzer Reports

FYI – Faruque's email to DAS regarding what he wants them to provide.

**From:** Khan, Faruque  
**Sent:** Monday, July 14, 2014 2:32 PM  
**To:** phavens@dow.com  
**Cc:** Kenny, Daniel; Montague, Kathryn V.  
**Subject:** RE: Example of Sympatec Laser particle Size Analyzer Reports

Hi Pat,

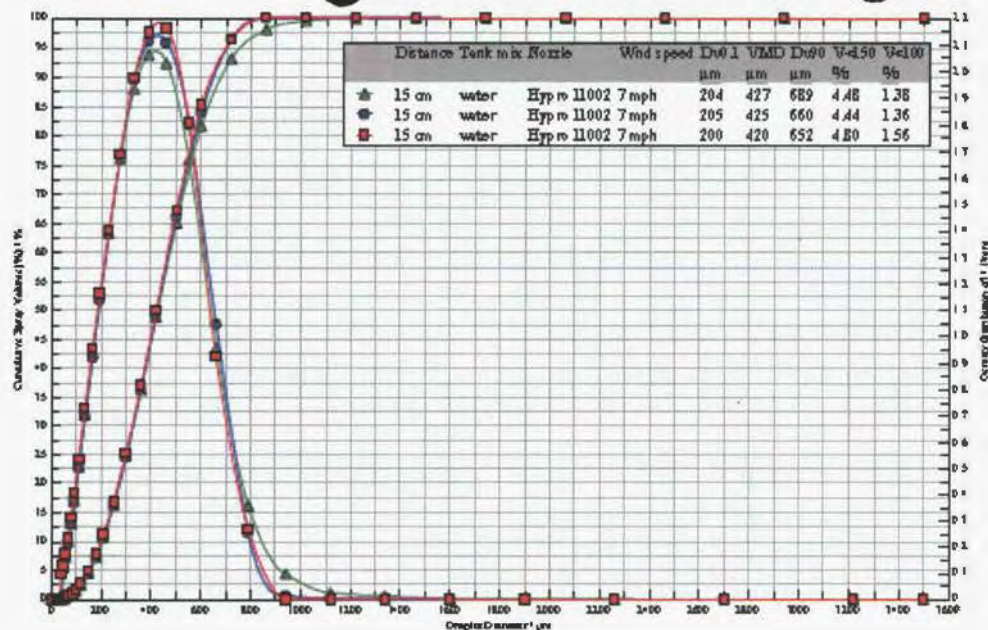
Good talking to you. Here is an example of particle size analyzer DOW provided in an earlier study (MRID 48862901).

As I mentioned you these particle size reports are important for our QA/QC process. If you have any additional questions, please give a call at (703-305-6127) or send me an email.

Good luck with your upcoming trip!

Faruque





SPRAYER, R7: 0.5/18.0...3500µm 2011-01-24, 14:11...H2O

D<sub>01</sub> = 202.77 +/- 2.38 µm

VMD = 423.96 +/- 3.27 µm

D<sub>05</sub> = 666.97 +/- 19.71 µm

conditions:

Study: Dow  
A.I. Product: water  
Crop oil/ 10gal:  
Adjuvant/ 10gal:

conditions:

Nozzle: Hypro 11002  
Pressure: 2.76 bar  
Wind speed: 7 mph

#### cumulative distribution with standard deviation

Diam. µm	Cum. Vol%	Std. Dev. %abs	Diam. µm	Cum. Vol%	Std. Dev. %abs	Diam. µm	Cum. Vol%	Std. Dev. %abs
18.00	0.00	0.00	110.00	2.45	0.14	850.00	99.24	1.18
22.00	0.00	0.00	150.00	4.57	0.20	1020.00	99.78	0.37
26.00	0.00	0.00	180.00	7.38	0.25	1220.00	99.93	0.13
30.00	0.00	0.00	210.00	10.83	0.28	1450.00	100.00	0.00
36.00	0.00	0.00	250.00	16.40	0.31	1740.00	100.00	0.00
44.00	0.02	0.04	300.00	24.31	0.33	2050.00	100.00	0.00
52.00	0.12	0.05	360.00	36.55	0.43	2450.00	100.00	0.00
62.00	0.28	0.06	420.00	49.18	0.66	2940.00	100.00	0.00
74.00	0.55	0.07	500.00	65.94	1.18	3500.00	100.00	0.00
86.00	0.90	0.08	600.00	83.49	1.87			
100.00	1.43	0.11	720.00	95.17	1.94			

From: Kenny, Daniel

Sent: Tuesday, July 08, 2014 6:20 PM

To: Khan, Faruque; Sankula, Sujatha

Subject: FW: Contact information

Hi Faruque and Sujatha. I forwarded Faruque's request for the additional information on the nozzle study, but the person from DAS that would be providing the information, Pat Havens, doesn't fully understand what you were asking for. In our discussion, we thought that perhaps it would be easiest if you called Pat directly and talked through the specifics. To that end, I have provided his phone number below. I think they are happy to help if they can as long as they can get a better understanding of what you are asking for.

Let me know if you are uncomfortable with this approach. Just so you know, Kay will be out of the office for the rest of the week, and I will be out of the office starting Thursday until July 23<sup>rd</sup>.

Thanks,  
Dan

---

**From:** Fonseca, Diego (D) [<mailto:dfonseca@dow.com>]  
**Sent:** Tuesday, July 08, 2014 6:14 PM  
**To:** Kenny, Daniel  
**Subject:** Contact information

Dan, see below Pat Havens contact information.

Phone: 317 337-3465

E-mail address: [phavens@dow.com](mailto:phavens@dow.com)

*Diego Fonseca* Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)





Dow AgroSciences

Dow AgroSciences LLC  
9330 Zionsville Road Indianapolis, IN 46268 USA

[www.dowagro.com](http://www.dowagro.com)

308/2E  
October 14, 2014

Document Processing Desk  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Daniel Kenny (7505P)

AI: 2,4-D  
EPA REGISTRATION NUMBER: 62719-25  
AI: GLYPHOSATE  
EPA REGISTRATION NUMBER: 62719-319

Dow AgroSciences is a member of both the Industry Task Force II on 2,4-D Research Data (2,4-D TF) and the Joint Glyphosate Task Force (JGTF). These task forces have been actively engaged in fulfilling the obligations under Registration Review and the EDSP for each of the respective active ingredients. All data required under the respective data call-in notices for both active ingredients has been completed and submitted for EPA review. As a member of both task forces, Dow AgroSciences has full data rights to support registration of both the technical active ingredients.

Sincerely,

Steve McMaster  
R&D Leader  
Commodity Herbicides  
317-337-4670  
317-337-4649 (FAX)  
[samcmaster@dow.com](mailto:samcmaster@dow.com)



Dow AgroSciences

MRID # 49426300

Dow AgroSciences LLC  
9330 Zionsville Road Indianapolis, IN 46268 USA

www.dowagro.com

308/2E  
July 11, 2014

Document Processing Desk (DATA / ESUB)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION

Enclosed is data in support of the Dow AgroSciences registration action for GF-2726 (Enlist™ Duo). Dow AgroSciences is respectfully submitting the Endangered Species Assessment in 27 states as agreed with the Agency.

Dow AgroSciences is submitting this submission electronically (e-PRISM.xml Data Submission for GF-2726).

**Contents of Submission**

**Volume**

Volume 1  
(Administrative)

**Contents**

- Transmittal document (this letter)
- EPA Form 8570-1, Application for Pesticide
- CD containing e-PRISM.xml – New Section 3

**Volume**  
**Guideline No.**

Volume #2  
N/A

**MRID NO.**  
49426301

**Study**

Endangered Species Assessment for 2,4-D Choline Salt use on Enlist® Corn and Soybean Crops in Alabama, Arkansas, Colorado, Delaware, Florida, Georgia, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, and West Virginia



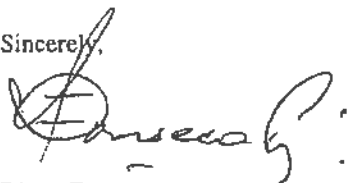
KATHRYN MONTAGUE/PM-23  
GF-2726 (A1: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION  
JULY 11, 2014

Page 2

Author(s): Tee, R. Scott; Greer, Colleen D.; 09-Jul-2014  
Wooding, Katie  
Study ID: 140935  
Pages: 1-80 (1 PDF copy)

Your EPA PRIA confirmation can be sent to [priatracking@dow.com](mailto:priatracking@dow.com). If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; ([kahipsky@dow.com](mailto:kahipsky@dow.com)) or Nestor Algarin, Regulatory Specialist at 317-337-5148 ([nalgarin@dow.com](mailto:nalgarin@dow.com)).

Sincerely,



Diego Fonseca  
Regulatory Leader -- Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
[dfonseca@dow.com](mailto:dfonseca@dow.com)

Enclosures

DF/kh



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-AUO	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/GF-2726	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Enclosed is data in support of the Dow AgroSciences registration action for GF-2726 (Enlist™ Duo). Dow AgroSciences is respectfully submitting the Endangered Species Assessment in 27 states as agreed with the Agency.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Diego Fonseca	Title Regulatory Leader	Telephone No. (Include Area Code) (317)337-4693
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Leader	
4. Typed Name Diego Fonseca (dfonseca@dow.com)	5. Date July 11, 2014	



Dow AgroSciences

MRID # 49384800

Dow AgroSciences LLC  
9330 Zionsville Road Indianapolis, IN 46268 USA

www.dowagro.com

308/2E  
July 1, 2014

Document Processing Desk (DATA / ESUB)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION

Enclosed is data in support of the Dow AgroSciences registration action for GF-2726. Dow AgroSciences is respectfully submitting data as requested by the Agency, in order to qualify nozzles that can be used for the application of GF-2726 (Enlist™ Duo).

Dow AgroSciences is submitting this submission electronically (e-PRISM.xml Data Submission for GF-2726).

**Contents of Submission**

**Volume**

Volume 1  
(Administrative)

**Contents**

- Transmittal document (this letter)
- EPA Form 8570-1, Application for Pesticide
- CD containing e-PRISM.xml – New Section 3

**Volume**

**Guideline No.**

Volume #2  
N/A

**MRID NO.**

49384801

**Study**

Low-Speed Wind Tunnel Droplet Size Spectrum Determinations  
with GF-2726  
Henry, R.S.; Havens, P.L.; Schleier, J.J.; 01-Jul-2014  
Kruger, G.R.  
Study ID: 140720  
Pages: 1-162 (1 PDF copy)

**E-SUBMISSION**

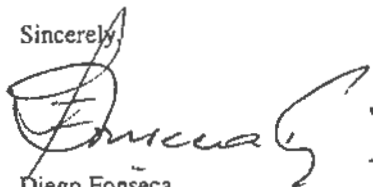


KATHRYN MONTAGUE/PM-23  
GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION  
JULY 1, 2014

Page 2

Your EPA PRIA confirmation can be sent to [priatracking@dow.com](mailto:priatracking@dow.com). If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; ([kahipsky@dow.com](mailto:kahipsky@dow.com)) or Nestor Algarin, Regulatory Specialist at 317-337-5148 ([nalgarin@dow.com](mailto:nalgarin@dow.com)).

Sincerely,



Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
[dfonseca@dow.com](mailto:dfonseca@dow.com)

Enclosures

DF/kh



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-AUO	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/GF-2726	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Enclosed is data in support of the Dow AgroSciences registration action for GF-2726. Dow AgroSciences is respectfully submitting data as requested by the Agency, in order to qualify nozzles that can be used for the application of GF-2726 (Enlist™ Duo).

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Plastic	
		If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Diego Fonseca		Title Regulatory Leader		Telephone No. (Include Area Code) (317)337-4693	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Leader			
4. Typed Name Diego Fonseca (dfonseca@dow.com)		5. Date July 1, 2014			

E-SUBMISSION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

July 8, 2014

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

BRUCE A. HOUTMAN  
DOW AGROSCIENCES LLC  
9330 ZIONSVILLE RD 308/2E  
INDIANAPOLIS, IN 46268-1054

PRODUCT NAME: GF-2726  
COMPANY NAME: DOW AGROSCIENCES LLC  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 62719-AUO  
EPA RECEIPT DATE: 07/03/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-1243.

Sincerely,

A handwritten signature in black ink, appearing to be "S. J. [unclear]".

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

**Fee for Service**

{954569}~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies?      ☐ Fee Waiver?

☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.      **23**

Receipt No.

S- **954569**

EPA File Symbol/Reg. No.

**62719-AUO**

Pin-Punch Date:

**7/1/2014**

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Jennifer Barnes

Date: 7/8/14

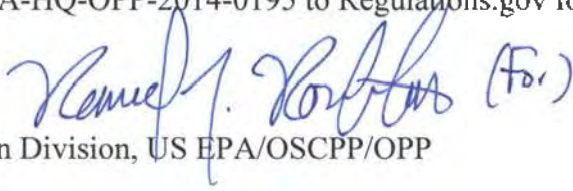
Remarks:

**E-SUBMISSION**

## Posting an FDMS Docket without a Federal Register Notice

### MEMORANDUM

**SUBJECT:** Posting EPA-HQ-OPP-2014-0195 to Regulations.gov for Public Access

**FROM:** Lois Rossi  
Director  
Registration Division, US EPA/OSCP/OPP  
Signature: 

**Thru:** Kathryn V. Montague  
Product Manager 2B  
Herbicide Branch, Registration Division, US EPA/OSCP/OPP  
Signature: 

Due to requests from commenters, the comment period associated with the submission by Dow AgroSciences to amend their 2,4-D choline salt herbicide for use on 2,4-D tolerant corn and soybeans has been extended through June 30, 2014. These requests are being granted to allow sufficient time to review the numerous technical documents contained in this docket. This memorandum authorizes extension of the public comment period.

Submit your comments, identified by Docket ID No. EPA-HQ-OPP-2014-0195, by one of the following methods:

- [www.regulations.gov](http://www.regulations.gov): Follow the on-line instructions for submitting comments.
- Mail: 2,4-D: New Use on Herbicide-Tolerant Corn and Soybean, Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Ave, NW, Washington, DC 20460.
- Hand Delivery: Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Avenue, NW, Washington, DC 20460. Such deliveries are only accepted during the Docket's normal hours of operation, and special arrangements should be made for deliveries of boxed information. To make special arrangements for hand delivery or delivery of boxed materials, please follow the instructions at <http://www.epa.gov/dockets/contacts.htm>.

EPA's policy is that all comments received will be included in the public docket without change and may be made available online at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through <http://www.regulations.gov> or e-mail. The <http://www.regulations.gov> Web site is an "anonymous access" system, which means EPA will not know your



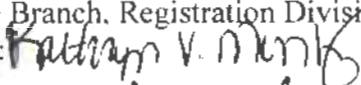
identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through <http://www.regulations.gov>, your e-mail address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, avoid any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket, visit the EPA Docket Center homepage at <http://www.epa.gov/epahome/dockets.htm>.

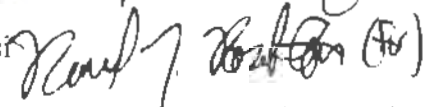
Should you have any questions regarding this memorandum, please contact Emily Schmid at (703) 347-0189, or email at [schmid.emily@epa.gov](mailto:schmid.emily@epa.gov).

## Posting an FDMS Docket without a Federal Register Notice

### MEMORANDUM

**SUBJECT:** Posting EPA-HQ-OPP-2014-0195 to Regulations.gov for Public Access

**FROM:** Kathryn V. Montague, Product Manager 23  
Herbicide Branch, Registration Division, US EPA/OSCPP/OPP  
Signature: 

**Thru:** Lois Rossi   
Director  
Registration Division, US EPA/OSCPP/OPP  
Signature:

This memorandum authorizes the posting of EPA-HQ-OPP-2014-0195 to Regulations.gov for public access.

Dow AgroSciences has submitted an application to amend their 2,4-D choline salt herbicide for use on 2,4-D tolerant corn and soybeans. This is an issue of high public interest and concern so the Agency feels it is important to get feedback from stakeholders before a final decision is reached.

This document will be open for public comment from April 30, 2014 to May 30, 2014.

Submit your comments, identified by Docket ID No. EPA-HQ-OPP-2014-0195, by one of the following methods:

- [www.regulations.gov](http://www.regulations.gov): Follow the on-line instructions for submitting comments.
- Mail: 2,4-D: New Use on Herbicide-Tolerant Corn and Soybean, Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Ave, NW, Washington, DC 20460.
- Hand Delivery: Environmental Protection Agency, Mailcode 28221T, 1200 Pennsylvania Avenue, NW, Washington, DC 20460. Such deliveries are only accepted during the Docket's normal hours of operation, and special arrangements should be made for deliveries of boxed information. To make special arrangements for hand delivery or delivery of boxed materials, please follow the instructions at <http://www.epa.gov/dockets/contacts.htm>.

EPA's policy is that all comments received will be included in the public docket without change and may be made available online at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be



Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through <http://www.regulations.gov> or e-mail. The <http://www.regulations.gov> Web site is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through <http://www.regulations.gov>, your e-mail address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, avoid any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket, visit the EPA Docket Center homepage at <http://www.epa.gov/epahome/dockets.htm>.

Should you have any questions regarding this memorandum, please contact Emily Schmid at (703) 347-0189, or email at [schmid.emily@epa.gov](mailto:schmid.emily@epa.gov).

**Section C**  
**Health and Environmental Safety Data**  
**(Includes Ecological Effects, Health Effects and Environmental Fate)**

*Tolerance Petition to  
Product (A.I.: 2,4-D )*

See data matrices (attached):



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 1 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: 2, 4-D Technical		
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
	2,4-D Technical (62719-24, 62719-25) / Generic			
830.1550	Product Identity and composition	41055801	62719	OWN
830.1550	Product Identity and composition	41055802	62719	OWN
830.1550	Product Identity and composition	41055804	62719	OLD
830.1550	Product Identity and composition	41055805	62719	OLD
830.1600	Description of materials used to produce the product	41055801	62719	OWN
830.1600	Description of materials used to produce the product	41055804	62719	OLD
830.1620	Description of production process	41055801	62719	OWN
830.1650	Description of formulation process	N/A FOR TECH		
830.1670	Description of formation of impurities	41055801	62719	OWN
830.1670	Description of formation of impurities	41973501	62719	OLD
830.1700	Preliminary analysis	41055805	62719	OLD
830.1700	Preliminary analysis	43777502	62719	OWN
830.1750	Certified Limits	41055804	62719	OLD
830.1750	Certified Limits	43777502	62719	OWN
830.1800	Enforcement analytical method	41055802	62719	OWN
830.6302	Color	41055803	62719	OWN
830.6303	Physical state	41055803	62719	OWN
830.6304	Odor	41055803	62719	OWN
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	41055803	62719	OWN
830.6314	Oxidizing or reducing action	41973501	62719	OWN
830.6315	Flammability	N/A FOR TECH		
830.6316	Explosibility	41973501	62719	OWN
830.6317	Storage stability of product	WAIVED	62719	OWN
Signature:	Name and Title: Diego Fonseca, Global Regulatory Manager Dow AgroSciences LLC			Date: July 22, 2014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 2 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product:	2, 4-D Technical	
Ingredient: 2,4-D		Chemical: 030001 for 2,4-D			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
830.6319	Miscibility	N/A FOR TECH			
830.6320	Corrosion characteristics	WAIVED	62719	OWN	
830.6321	Dielectric breakdown voltage	N/A FOR TECH			
830.7000	pH of water solutions or suspensions	N/A FOR TECH			
830.7050	UV/Visible absorption	44543504	62719	OWN	
830.7100	Viscosity	N/A FOR TECH			
830.7200	Melting point/melting range	41055803	62719	OLD	
830.7200	Melting point/melting range	41973501	62719	OWN	
830.7220	Boiling point/boiling range	N/A FOR TECH			
830.7300	Density/relative density	41055803	62719	OWN	
830.7300	Density/relative density	47290627	62719	OWN	
830.7370	Dissociation constant in water	41055803	62719	OWN	
830.7550	Partition coefficient (n-octanol/water), shake flask method	41055803	62719	OWN	
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	N/A FOR TECH			
830.7840	Water solubility: column elution method, shake flask method	41055803	62719	OWN	
830.7860	Water solubility: generator column method	N/A FOR TECH			
830.7950	Vapor pressure	41055803	62719	OWN	
835.8100	Field Volatility	48862902	62719	OWN	
870.1100	Acute oral toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.1200	Acute dermal toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 3 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product:	2, 4-D Technical	
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
870.1300	Acute inhalation toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.2400	Acute eye irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.2500	Acute dermal irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.2600	Skin sensitization	47392101	62719	OWN
71-1	Acute Avian Oral Toxicity (LD50) in Bobwhite Quail or Mallard Duck	41158303	62719	OLD
71-2(a)	Avian Dietary LC50 (bobwhite)	41158305	62719	OLD
71-2(b)	Avian Dietary LC50 (mallard)	41158304	62719	OLD
72-1(b)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41158306	62719	OLD
72-1(c)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41737303	62719	OLD
72-1(d)	Fish Tox Rainbow	41158306	62719	OLD
072-2(a)	Invertebrate Toxicity Freshwater LC50	41158312	62719	OLD
072-2(b)	Invertebrate Toxicity Freshwater LC50	41835207	62719	OLD
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835205	62719	OLD
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835201	62719	OLD
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835202	62719	OLD
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835204	62719	OLD
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835206	62719	OLD
72-3(d)	Acute LC50 Estuarine and Marine Organisms (fish)	41835202	62719	OLD
72-3(e)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835201	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 4 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: 2, 4-D Technical	
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
72-3(f)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD
72-4(a)	Early Life Stage in Fish	41737305	62719	OLD
72-4(b)	Life Cycle in Aquatic Invertebrates (Daphnia/Mysid)	41835207	62719	OLD
081-1	Acute Oral Toxicity in the Rat	44725301	62719	OLD
081-2	Acute Dermal Toxicity	44734201	62719	OLD
081-3	Acute Inhalation Toxicity in the Rat	44725302	62719	OLD
081-3	Acute Inhalation Toxicity in the Rat	163712	62719	OLD
081-4	Primary Eye Irritation in the Rabbit	44725303	62719	OLD
081-5	Primary Dermal Irritation	44734202	62719	OLD
081-6	Dermal Sensitization	163713	62719	OLD
081-6	Dermal Sensitization	44725304	62719	OLD
82-1(a)	90-Day Feeding Study in the Rodent (rat)	41896701	62719	OLD
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780003	62719	OLD
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780005	62719	OLD
82-2	21-Day Dermal	41735302	62719	OLD





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 5 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: 2, 4-D Technical		
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
82-2	21-Day Dermal	41735305	62719	OLD
83-3(a)	Teratogenicity in the Rat	42304601	62719	OLD
83-3(a)	Teratogenicity in the Rat	42304602	62719	OLD
83-3(b)	Teratogenicity in the Rabbit	42304603	62719	OLD
83-3(b)	Teratogenicity in the Rabbit	42304604	62719	OLD
84-2(a)	Gene Mutation	41409803	62719	OLD
084-2(b)	Structural Chromosome Aberration	41420005	62719	OLD
84-2(b)	Structural Chromosome Aberration	41409806	62719	OLD
84-4	Other Genotoxic Effects	41870103	62719	OLD
84-4	Other Genotoxic Effects	41409809	62719	OLD
085-1	General Metabolism	142119	62719	OLD
85-1	General Metabolism	42261801	62719	OLD
123-1(a)	Seed Germination/Seedling Emergence	42449201	62719	OLD
123-1(a)	Seed Germination/Seedling Emergence	42772902	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 6 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: 2, 4-D Technical			
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
123-1(a)	Seed Germination/Seedling Emergence	43526901	62719	OLD	
850.4250	Seed Germination/Seedling Emergence	42416802	62719	OLD	
123-1(b)	Vegetative Vigor	42416801	62719	OLD	
123-1(b)	Vegetative Vigor	42172905	62719	OLD	
123-1(b)	Vegetative Vigor	42343902	62719	OLD	
123-1(b)	Vegetative Vigor	42772904	62719	OLD	
123-2	Aquatic Plant Growth	41735202	62719	OLD	
123-2	Aquatic Plant Growth	41735203	62719	OLD	
123-2	Aquatic Plant Growth	41735204	62719	OLD	
123-2	Aquatic Plant Growth	41735205	62719	OLD	
123-2	Aquatic Plant Growth	41735206	62719	OLD	
141-1	Honey Bee Acute Contact (LD50)	44517301	62719	OLD	
141-1	Honey Bee Acute Contact (LD50)	44517302	62719	OLD	
161-1	Hydrolysis	42735401	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 7 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: 2, 4-D Technical		
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
161-1	Hydrolysis	42770501	62719	OLD	
161-1	Hydrolysis	42770502	62719	OLD	
161-2	Photodegradation in Water	42749702	62719	OLD	
161-3	Photodegradation in Soil	Waived	62719	OLD	
161-4	Photodegradation in Air	Waived	62719	OLD	
162-1	Aerobic Soil Metabolism Study	43415901	62719	OLD	
162-2	Aerobic Soil Metabolism Study	Waived	62719	OLD	
162-3	Anaerobic Aquatic Metabolism Study	43691001	62719	OLD	
162-4	Aerobic Aquatic Metabolism Study	Waived	62719	OLD	
163-1	Leach/Adsorption/Desorption	Waived	62719	OLD	
163-2	Lab Volatility Study	42059601	62719	OLD	
163-3	Volatility - field	Waived	62719	OLD	
164-1	Soil Field Dissipation Study	43514601	62719	OLD	
164-1	Soil Field Dissipation Study	43542801	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 8 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: 2, 4-D Technical			
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
164-1	Soil Field Dissipation Study	43640601	62719	OLD	
164-1	Soil Field Dissipation Study	43705202	62719	OLD	
164-1	Soil Field Dissipation Study	43762401	62719	OLD	
164-1	Soil Field Dissipation Study	43762402	62719	OLD	
164-1	Soil Field Dissipation Study	43762403	62719	OLD	
164-1	Soil Field Dissipation Study	43762404	62719	OLD	
164-1	Soil Field Dissipation Study	43533401	62719	OLD	
164-1	Soil Field Dissipation Study	43831701	62719	OLD	
164-1	Soil Field Dissipation Study	43831702	62719	OLD	
164-1	Soil Field Dissipation Study	43849102	62719	OLD	
164-1	Soil Field Dissipation Study	43864001	62719	OLD	
164-1	Soil Field Dissipation Study	43872703	62719	OLD	
164-1	Soil Field Dissipation Study	43914701	62719	OLD	
164-3	Forestry Field Dissipation	44603101	62719	OWN	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 9 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product:	2, 4-D Technical	
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
164-3	Forestry Field Dissipation	43908303	62719	OLD	
164-3	Forestry Field Dissipation	43927101	62719	OLD	
171-4	Magnitude of Residue in Irrigated Crops	43356302	62719	OLD	
171-4(a)	Nature of Residue in Plants (Potato)	42423101	62719	OLD	
171-4(a)	Nature of Residue in Plants (Wheat)	42439701	62719	OLD	
171-4(a)	Nature of Residue in Plants (Wheat)	42615601	62719	OLD	
171-4(a)	Nature of Residue in Plants (Potato)	43496101	62719	OLD	
171-4(b)	Nature of Residue in Plants (Potato)	Waived	62719	OLD	
860.1340	Residue Analytical Method (Plants)	46293601	959857	PL	
171-4(c)	Residue Analytical Method (Plants)	43691101	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43289301	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43665201	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43592101	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43610802	62719	OLD	



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 10 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product:	2, 4-D Technical	
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
171-4(c)	Residue Analytical Method (Plants)	43669801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43676801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43693701	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43697801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43709701	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43779501	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43779503	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43797901	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	44190301	62719	OWN	
171-4(c)	Residue Analytical Method (Plants)	44190302	62719	OWN	
171-4(c)	Residue Analytical Method (Plants)	44024801	62719	OWN	
171-4(c)	Residue Analytical Method (Plants)	40881401	PL	PL	
171-4(e)	Storage Stability	43809901	62719	OLD	
171-4(e)	Storage Stability	44603101	62719	OWN	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 11 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: 2, 4-D Technical		
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
171-4(k)	Magnitude of Residue Corn, Field	43676801	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779501	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779503	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43610802	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43592101	62719	OLD
N/A	DEREK Structure Activity Relationship Toxicity Endpoint Assessment for 2,6-Dichlorophenylacetic Acid (CAS 6575-24-2)	46454401	62719	OLD
N/A	Error Only Response to the Environmental Fate and Effects Division's Risk Assessment for the Reregistration Eligibility	46201801	62719	OLD
N/A	Error Only Response to Health Effects Division's Risk Assessment for the Reregistration Eligibility Decision (RED) For	46253601	959857	PL
N/A	Lack of Relevance of Toxicology Findings in Dogs for Assessment of Potential Human Health Risks of 2,4-D: A White	45861201	62719	OWN
N/A	Evaluation of Potential Aggregate Human Health Risks Associated with Agricultural and Consumer Uses of 2,4-D	46349601	62719	OWN
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Green Lake, Minnesota	45931801	62719	OWN
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Lake Woodruff, Florida	45897101	62719	OWN
N/A	Hydrolysis of 2,4-Dichlorophenoxyacetic Acid-2-Butoxyethyl Ester To 2,4-Dichlorophenoxyacetic Acid in A Soil/Water	41353701	62719	OWN
N/A	Comparative Inter-Species Pharmacokinetics of Phenoxyacetic acid Herbicides and Related Organic Acids	46328601	62719	OWN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 12 of 12

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-24 and 62719-25		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product:	2, 4-D Technical	
Ingredient: 2,4-D	Chemical: 030001 for 2,4-D			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
N/A	Association Between Canine Malignant Lymphoma Living in Industrial Area and Use of Chemical by Dog Owners	45516101	62719	OWN
N/A	2,4-Dichlorophenol: Relevance for 2,4-D Treated Corn Containing the DAS AAD-1 Trait	48260705	62719	OWN
N/A	Wind Tunnel Droplet Size Measurement for Sprays Containing 2,4-D and Glyphosate	48862901	62719	OWN
N/A	Stewardship of Herbicide Tolerant Trait Technology for DAS 40278-9 Corn and Associated Herbicide Products	48862903	62719	OWN
CITE-ALL			Industry Task Force II on 2,4-D Research Data	OWN
CITE-ALL			959857	PL
CITE-ALL			Agricultural Re-Entry Task Force	OWN
CITE-ALL			Endangered Species Task Force	OWN
CITE-ALL			Outdoor Residential Exposure Task Force	OWN
CITE-ALL			Spray Drift Task Force	PER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 1 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: July 22, 2014		EPA Reg No.: 62719-AUO			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
	GF-2726 (62719-AUO)				
830.1550	Product Identity and composition	48644101	62719	OWN	
830.1600	Description of materials used to produce the product	48644101	62719	OWN	
830.1670	Description of formation of impurities	48644101	62719	OWN	
830.1750	Certified Limits	48644101	62719	OWN	
830.1800	Enforcement analytical method	48644101	62719	OWN	
830.6302	Color	48499901	62719	OWN	
830.6303	Physical State	48499901	62719	OWN	
830.6304	Odor	48499901	62719	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	48499901	62719	OWN	
830.6315	Flammability	48499901	62719	OWN	
830.6316	Explosibility	48499901	62719	OWN	
830.6320	Corrosion Characteristics	49107901	62719	OWN	
830.7000	pH	48499901	62719	OWN	
830.7100	Viscosity	48499901	62719	OWN	
830.7300	Density/Relative Density/Bulk Density	48499901	62719	OWN	
860.1550	Proposed Tolerances	48644102	62719	OWN	
860.6317	Storage Stability	49107901	62719	OWN	
870.2600	Skin sensitization	48644103	62719	OWN	
N/A	Field Spray Drift Determinations with GF-2726 and 2,4-D/Glyphosate Tank Mixes	48844001	62719	OWN	
N/A	Spray Chamber Droplet Size Distributions for GF-2726 Herbicide with Various Spray Nozzles	49163301	62719	OWN	
Signature:		Name and Title: Diego Fonseca, Global Regulatory Manager Dow AgroSciences LLC			Date: July 22, 2014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 2 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
N/A	Extrapolation of the Drift Reduction Potential of Enlist Duo Herbicide to Additional Nozzles by Validation with Field Drift Deposition Data	49199101	62719	OWN
N/A	Stewardship of Enlist Duo Herbicide	49199102	62719	OWN
	2,4-D Technical (62719-24, 62719-25) / Generic			
830.1550	Product Identity and composition	41055801	62719	OWN
830.1550	Product Identity and composition	41055802	62719	OWN
830.1550	Product Identity and composition	41055804	62719	OLD
830.1550	Product Identity and composition	41055805	62719	OLD
830.1600	Description of materials used to produce the product	41055801	62719	OWN
830.1600	Description of materials used to produce the product	41055804	62719	OLD
830.1620	Description of production process	41055801	62719	OWN
830.1650	Description of formulation process	N/A FOR TECH		
830.1670	Description of formation of impurities	41055801	62719	OWN
830.1670	Description of formation of impurities	41973501	62719	OLD
830.1700	Preliminary analysis	41055805	62719	OLD
830.1700	Preliminary analysis	43777502	62719	OWN
830.1750	Certified Limits	41055804	62719	OLD
830.1750	Certified Limits	43777502	62719	OWN
830.1800	Enforcement analytical method	41055802	62719	OWN
830.6302	Color	41055803	62719	OWN
830.6303	Physical state	41055803	62719	OWN
830.6304	Odor	41055803	62719	OWN
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	41055803	62719	OWN
830.6314	Oxidizing or reducing action	41973501	62719	OWN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 3 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460). Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
830.6315	Flammability	N/A FOR TECH		
830.6316	Explosibility	41973501	62719	OWN
830.6317	Storage stability of product	WAIVED	62719	OWN
830.6319	Miscibility	N/A FOR TECH		
830.6320	Corrosion characteristics	WAIVED	62719	OWN
830.6321	Dielectric breakdown voltage	N/A FOR TECH		
830.7000	pH of water solutions or suspensions	N/A FOR TECH		
830.7050	UV/Visible absorption	44543504	62719	OWN
830.7100	Viscosity	N/A FOR TECH		
830.7200	Melting point/melting range	41055803	62719	OLD
830.7200	Melting point/melting range	41973501	62719	OWN
830.7220	Boiling point/boiling range	N/A FOR TECH		
830.7300	Density/relative density	41055803	62719	OWN
830.7300	Density/relative density	47290627	62719	OWN
830.7370	Dissociation constant in water	41055803	62719	OWN
830.7550	Partition coefficient (n-octanol/water), shake flask method	41055803	62719	OWN
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	N/A FOR TECH		
830.7840	Water solubility: column elution method, shake flask method	41055803	62719	OWN
830.7860	Water solubility: generator column method	N/A FOR TECH		
830.7950	Vapor pressure	41055803	62719	OWN
835.8100	Field Volatility	48862902	62719	OWN
870.1100	Acute oral toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.1200	Acute dermal toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 4 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: July 22, 2014		EPA Reg No.: 62719-AUO			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
870.1300	Acute inhalation toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2400	Acute eye irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2500	Acute dermal irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2600	Skin sensitization	47392101	62719	OWN	
71-1	Acute-Avian Oral Toxicity (LD50) in Bobwhite Quail or Mallard Duck	41158303	62719	OLD	
71-2(a)	Avian Dietary LC50 (bobwhite)	41158305	62719	OLD	
71-2(b)	Avian Dietary LC50 (mallard)	41158304	62719	OLD	
72-1(b)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41158306	62719	OLD	
72-1(c)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41737303	62719	OLD	
72-1(d)	Fish Tox Rainbow	41158306	62719	OLD	
072-2(a)	Invertebrate Toxicity Freshwater LC50	41158312	62719	OLD	
072-2(b)	Invertebrate Toxicity Freshwater LC50	41835207	62719	OLD	
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835205	62719	OLD	
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835201	62719	OLD	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 5 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product:	GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835202	62719	OLD
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835204	62719	OLD
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835206	62719	OLD
72-3(d)	Acute LC50 Estuarine and Marine Organisms (fish)	41835202	62719	OLD
72-3(e)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835201	62719	OLD
72-3(f)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD
72-4(a)	Early Life Stage in Fish	41737305	62719	OLD
72-4(b)	Life Cycle in Aquatic Invertebrates (Daphnia/Mysid)	41835207	62719	OLD
081-1	Acute Oral Toxicity in the Rat	44725301	62719	OLD
081-2	Acute Dermal Toxicity	44734201	62719	OLD
081-3	Acute Inhalation Toxicity in the Rat	44725302	62719	OLD
081-3	Acute Inhalation Toxicity in the Rat	163712	62719	OLD
081-4	Primary Eye Irritation in the Rabbit	44725303	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 6 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726			
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
081-5	Primary Dermal Irritation	44734202	62719	OLD	
081-6	Dermal Sensitization	163713	62719	OLD	
081-6	Dermal Sensitization	44725304	62719	OLD	
82-1(a)	90-Day Feeding Study in the Rodent (rat)	41896701	62719	OLD	
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780003	62719	OLD	
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780005	62719	OLD	
82-2	21-Day Dermal	41735302	62719	OLD	
82-2	21-Day Dermal	41735305	62719	OLD	
83-3(a)	Teratogenicity in the Rat	42304601	62719	OLD	
83-3(a)	Teratogenicity in the Rat	42304602	62719	OLD	
83-3(b)	Teratogenicity in the Rabbit	42304603	62719	OLD	
83-3(b)	Teratogenicity in the Rabbit	42304604	62719	OLD	
84-2(a)	Gene Mutation	41409803	62719	OLD	
084-2(b)	Structural Chromosome Aberration	41420005	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 7 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726			
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
84-2(b)	Structural Chromosome Aberration	41409806	62719	OLD	
84-4	Other Genotoxic Effects	41870103	62719	OLD	
84-4	Other Genotoxic Effects	41409809	62719	OLD	
085-1	General Metabolism	142119	62719	OLD	
85-1	General Metabolism	42261801	62719	OLD	
123-1(a)	Seed Germination/Seedling Emergence	42449201	62719	OLD	
123-1(a)	Seed Germination/Seedling Emergence	42772902	62719	OLD	
123-1(a)	Seed Germination/Seedling Emergence	43526901	62719	OLD	
850.4250	Seed Germination/Seedling Emergence	42416802	62719	OLD	
123-1(b)	Vegetative Vigor	42416801	62719	OLD	
123-1(b)	Vegetative Vigor	42172905	62719	OLD	
123-1(b)	Vegetative Vigor	42343902	62719	OLD	
123-1(b)	Vegetative Vigor	42772904	62719	OLD	
123-2	Aquatic Plant Growth	41735202	62719	OLD	



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 8 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

## DATA MATRIX

Date: July 22, 2014		EPA Reg No.: 62719-AUO			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726			
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
123-2	Aquatic Plant Growth	41735203	62719	OLD	
123-2	Aquatic Plant Growth	41735204	62719	OLD	
123-2	Aquatic Plant Growth	41735205	62719	OLD	
123-2	Aquatic Plant Growth	41735206	62719	OLD	
141-1	Honey Bee Acute Contact (LD50)	44517301	62719	OLD	
141-1	Honey Bee Acute Contact (LD50)	44517302	62719	OLD	
161-1	Hydrolysis	42735401	62719	OLD	
161-1	Hydrolysis	42770501	62719	OLD	
161-1	Hydrolysis	42770502	62719	OLD	
161-2	Photodegradation in Water	42749702	62719	OLD	
161-3	Photodegradation in Soil	Waived	62719	OLD	
161-4	Photodegradation in Air	Waived	62719	OLD	
162-1	Aerobic Soil Metabolism Study	43415901	62719	OLD	
162-2	Aerobic Soil Metabolism Study	Waived	62719	OLD	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 9 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
162-3	Anaerobic Aquatic Metabolism Study	43691001	62719	OLD
162-4	Aerobic Aquatic Metabolism Study	Waived	62719	OLD
163-1	Leach/Adsorption/Desorption	Waived	62719	OLD
163-2	Lab Volatility Study	42059601	62719	OLD
163-3	Volatility - field	Waived	62719	OLD
164-1	Soil Field Dissipation Study	43514601	62719	OLD
164-1	Soil Field Dissipation Study	43542801	62719	OLD
164-1	Soil Field Dissipation Study	43640601	62719	OLD
164-1	Soil Field Dissipation Study	43705202	62719	OLD
164-1	Soil Field Dissipation Study	43762401	62719	OLD
164-1	Soil Field Dissipation Study	43762402	62719	OLD
164-1	Soil Field Dissipation Study	43762403	62719	OLD
164-1	Soil Field Dissipation Study	43762404	62719	OLD
164-1	Soil Field Dissipation Study	43533401	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 10 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
164-1	Soil Field Dissipation Study	43831701	62719	OLD
164-1	Soil Field Dissipation Study	43831702	62719	OLD
164-1	Soil Field Dissipation Study	43849102	62719	OLD
164-1	Soil Field Dissipation Study	43864001	62719	OLD
164-1	Soil Field Dissipation Study	43872703	62719	OLD
164-1	Soil Field Dissipation Study	43914701	62719	OLD
164-3	Forestry Field Dissipation	44603101	62719	OWN
164-3	Forestry Field Dissipation	43908303	62719	OLD
164-3	Forestry Field Dissipation	43927101	62719	OLD
171-4	Magnitude of Residue in Irrigated Crops	43356302	62719	OLD
171-4(a)	Nature of Residue in Plants (Potato)	42423101	62719	OLD
171-4(a)	Nature of Residue in Plants (Wheat)	42439701	62719	OLD
171-4(a)	Nature of Residue in Plants (Wheat)	42615601	62719	OLD
171-4(a)	Nature of Residue in Plants (Potato)	43496101	62719	OLD



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 11 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

## DATA MATRIX

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
171-4(b)	Nature of Residue in Plants (Potato)	Waived	62719	OLD
860.1340	Residue Analytical Method (Plants)	46293601	959857	PL
171-4(c)	Residue Analytical Method (Plants)	43691101	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43289301	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43665201	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43592101	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43610802	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43669801	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43676801	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43693701	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43697801	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43709701	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43779501	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43779503	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 12 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product:	GF-2726
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
171-4(c)	Residue Analytical Method (Plants)	43797901	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	44190301	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	44190302	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	44024801	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	40881401	PL	PL
171-4(e)	Storage Stability	43809901	62719	OLD
171-4(e)	Storage Stability	44603101	62719	OWN
171-4(k)	Magnitude of Residue Corn, Field	43676801	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779501	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779503	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43610802	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43592101	62719	OLD
N/A	DEREK Structure Activity Relationship Toxicity Endpoint Assessment for 2,6-Dichlorophenylacetic Acid (CAS 6575-24-2)	46454401	62719	OLD
N/A	Error Only Response to the Environmental Fate and Effects Division's Risk Assessment for the Reregistration Eligibility	46201801	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 13 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
N/A	Error Only Response to Health Effects Division's Risk Assessment for the Reregistration Eligibility Decision (RED) For	46253601	959857	PL
N/A	Lack of Relevance of Toxicology Findings in Dogs for Assessment of Potential Human Health Risks of 2,4-D: A White	45861201	62719	OWN
N/A	Evaluation of Potential Aggregate Human Health Risks Associated with Agricultural and Consumer Uses of 2,4-D	46349601	62719	OWN
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Green Lake, Minnesota	45931801	62719	OWN
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Lake Woodruff, Florida	45897101	62719	OWN
N/A	Hydrolysis of 2,4-Dichlorophenoxyacetic Acid-2-Butoxyethyl Ester To 2,4-Dichlorophenoxyacetic Acid in A Soil/Water	41353701	62719	OWN
N/A	Comparative Inter-Species Pharmacokinetics of Phenoxyacetic acid Herbicides and Related Organic Acids	46328601	62719	OWN
N/A	Association Between Canine Malignant Lymphoma Living in Industrial Area and Use of Chemical by Dog Owners	45516101	62719	OWN
N/A	2,4-Dichlorophenol: Relevance for 2,4-D Treated Corn Containing the DAS AAD-1 Trait	48260705	62719	OWN
N/A	Wind Tunnel Droplet Size Measurement for Sprays Containing 2,4-D and Glyphosate	48862901	62719	OWN
N/A	Stewardship of Herbicide Tolerant Trait Technology for DAS 40278-9 Corn and Associated Herbicide Products	48862903	62719	OWN
CITE-ALL			Industry Task Force II on 2,4-D Research Data	OWN
CITE-ALL			959857	PL
CITE-ALL			Agricultural Re-Entry Task Force	OWN





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, O.C. 20460

Page 14 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
CITE-ALL			Endangered Species Task Force	OWN
CITE-ALL			Outdoor Residential Exposure Task Force	OWN
CITE-ALL			Spray Drift Task Force	PER
	Glyphosate DMA 62% Technical (62719-554) / Generic			
830.1550	Product Identity and Composition	46730701	62719	OWN
830.1600	Description of Materials Used to Produce the Product	46730701	62719	OWN
830.1620	Description of Production Process	46730701	62719	OWN
830.1670	Discussion of Formation of Impurities	46730701	62719	OWN
830.1750	Certified Limits	46730701	62719	OWN
830.1800	Enforcement Analytical Method	46730701	62719	OWN
830.1700	Preliminary Analysis	46730702	62719	OWN
830.6302	Color	46730703	62719	OWN
830.6303	Physical State	46730703	62719	OWN
830.6304	Odor	46730703	62719	OWN
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	46816106	62719	PER
830.6314	Oxidation/Reduction: Chemical Incompatibility	46730703	62719	OWN
830.6315	Flammability	46730703	62719	OWN
830.6316	Explosibility	46730703	62719	OWN
830.6317	Storage Stability	47204902	62719	OWN
830.6320	Corrosion Characteristics	47204902	62719	OWN
830.7000	pH	46730703	62719	OWN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 15 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
830.7100	Viscosity	46730703	62719	OWN
830.7300	Density/Relative Density/Bulk Density	46730703	62719	OWN
N/A	Determination of Dissociation of Glyphosate DMA Salt	46730704	62719	OWN
870.1100	Acute Oral Tox	46730705	62719	OWN
870.1200	Acute Dermal Tox	46730706	62719	OWN
870.1300	Acute Inhalation Tox	46730707	62719	OWN
	Acute Eye Irritation	46730708	62719	OWN
870.2500	Acute Dermal Irritation	46730709	62719	OWN
870.2600	Skin Sensitization	46730710	62719	OWN
N/A	Dow AgroSciences LLC Proposal for the Addition of the Dimethylamine Salt to the List of Acceptable Salt Forms Listed in the Established Tolerance of Glyphosate (40 CFR 180.364)	46747101	62719	OWN
71-1	Acute Avian Oral Tox	00108204	524	Old
71-2(a)	Avian Dietary Tox	00076492	524	Old
71-2(b)	Avian Dietary Tox	00108107	524	Old
71-4(a)	Avian Reproduction	00108207	524	Old
71-4(b)	Avian Reproduction	00111953	524	Old
71-3	Wild Mammal Acute Tox	00067039	524	Old
72-1	Fish Acute Tox, Freshwater and Marine	00136339	524	Old
72-1	Fish Acute Tox, Freshwater and Marine	00108205	524	Old
72-1	Fish Acute Tox, Freshwater and Marine	44125705	33660	Per
72-1	Fish Acute Tox, Freshwater and Marine	44125704	33660	Per
72-2	Aquatic Invertebrate Acute Tox, Freshwater Daphnids	00108172	524	Old
72-2	Aquatic Invertebrate Acute Tox, Freshwater Daphnids	44125706	33660	Per
72-3	Mysid Acute Tox	00108110	524	Old
72-3	Mysid Acute Tox	00108111	524	Old
72-5	Fish Life Cycle Toxicity	00108171	524	Old



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 16 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
81-1	Acute Oral Tox	44142104	33660	Per
81-1	Acute Oral Tox	44125707	33660	Per
81-2	Acute Dermal Tox	44142105	33660	Per
81-2	Acute Dermal Tox	44257902	33660	Per
81-3	Acute Inhalation Tox	44142106	33660	Per
81-4	Acute Eye Irritation	44142107	33660	Per
81-4	Acute Eye Irritation	00077236	524	Old
81-5	Acute Dermal Irritation	44142108	33660	Per
81-5	Acute Dermal Irritation	44257901	33660	Per
81-6	Skin Sensitization	44142109	33660	Per
81-6	Skin Sensitization	44257903	33660	Per
81-6	Skin Sensitization	44257902	33660	Per
82-1	Repeated Dose 28-Day Oral Tox in Rodents	44621800	33660	Per
82-1	Repeated Dose 28-Day Oral Tox in Rodents	44125709	33660	Per
82-1	Subchronic Rodent Oral Toxicity, 90-Day	44125708	33660	Per
82-1	Subchronic Rodent Oral Toxicity, 90-Day	00093879	524	Old
83-3	Prenatal Development Tox	00046363	524	Old
83-3	Prenatal Development Tox	00046362	524	Old
83-4	Reproduction and Fertility Effects	00105995	524	Old
84-2	Gene Mutation/Structural Chromosome Abberation	44621800	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	44125711	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	44125710	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	00078620	524	Old
84-2	Gene Mutation/Structural Chromosome Abberation	00078619	524	Old
122-1	Terrestrial Plant Tox, Tier I (Seedling Emergence)	44125712	33660	Per
123-1	Seed Germination/Root Elongation Tox	44125715	33660	Per
123-1	Seed Germination/Root Elongation Tox	45045101	33660	Per
122-2	Aquatic Plant Tox Using <i>Lemna</i> spp., Tiers I and II	44125714	33660	Per



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 17 of 17

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: July 22, 2014		EPA Reg No.: 62719-AUO		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
122-2	Aquatic Plant Tox Using <i>Lemna</i> spp., Tiers I and II	44125713	33660	Per
141-1	Honey Bee Acute Contact Toxicity	00026489	524	Old
163-1	Leaching and Adsorption / Desorption	00108192	524	Old
163-1	Leaching and Adsorption / Desorption	00108140	524	Old
163-1	Leaching and Adsorption / Desorption	00076493	524	Old
164-1	Dissipation Field Studies - Soil	44621800	33660	Per
162-3	Anaerobic Aquatic Metabolism	44621801	33660	Per
162-3	Anaerobic Aquatic Metabolism	44621800	33660	Per
162-3	Anaerobic Aquatic Metabolism	44124718	33660	Per
164-1	Dissipation Field Studies - Soil	44422201	33660	Per
164-1	Dissipation Field Studies - Soil	44125719	33660	Per
161-1	Hydrolysis as a Function of pH and Temperature	00108192	524	Old
161-2	Photodegradation in Water	44621800	33660	Per
161-2	Photodegradation in Water	44125716	33660	Per
162-1	Aerobic Soil	44621800	33660	Per
162-1	Aerobic Soil	44125717	33660	Per

**Schmid, Emily**

---

**From:** Fonseca, Diego (D) [dfonseca@dow.com]  
**Sent:** Friday, March 07, 2014 4:05 PM  
**To:** Montague, Kathryn V.  
**Cc:** Schmid, Emily; Kenny, Daniel; Houtman, Bruce (BA); Cuffe, John; Palmer, Damon (M); Krieger, Mark (M)  
**Subject:** Additional Information Requested for the Pending Registration of Enlist Duo Herbicide (62719-AUO)  
**Attachments:** ENLIST request for additional information per 13feb2014 call with dow.pdf; DAS Response to EPA Question on Ensuring TUA Compliance.pdf; DAS Response to EPA Question on Detection and Management of Weed Resista....pdf; Framework for Enlist Duo Herbicide Management Plan.pdf

Dear Kay,

As stated by EPA in its letter of February 24, 2014, this information is required in order for the Agency to proceed with the review of the proposed registration of Enlist Duo Herbicide for use on Enlist corn and Enlist soybean.

**1. The Agency requests that Dow provide details on the calculations used to arrive at the 60-foot buffer zone, currently on the draft proposed label.**

Response: Dow AgroSciences respectfully clarifies that the "60-foot" value as used in the "Protection of Sensitive Areas" section of the January 23<sup>rd</sup> draft GF-2726 Herbicide label was not derived from any DAS calculation. This value was verbally communicated to DAS by US EPA in 2013 as a conservative preliminary estimate of the outcome of the pending EPA risk assessments. DAS has simply used the "60-foot" value since December 9<sup>th</sup> 2013, as a placeholder in the respective section of GF-2726 label pending the completion of the appropriate assessments by the Agency.

**2. The following revisions are needed for the pending draft label for 62719-AUO)(version 20140123):**

Response: All items requested here (No. 2) were addressed in a separate e-mail specific to label changes, sent to EPA today March 7<sup>th</sup>.

**3. The Agency needs additional details pertaining to Dow's strategy for determining/ensuring grower compliance with TUA:**



Response: These items (EPA question No. 3) are addressed in the attached document "DAS Response to EPA Question on Ensuring TUA Compliance.pdf". Note that this document contains Confidential Business Information.

**4. The Agency needs additional information on Dow's strategy for en detection/management of resistance:**

Response: These items (EPA question No. 4) are addressed in the attached document "DAS Response to EPA Question on Detection and Management of Weed Resistance.pdf". Note that this document contains Confidential Business Information.

**5. The Agency requests that Dow provide us with the most current Pr Guide**

Response: A draft Product Use Guide was submitted to EPA October 23<sup>rd</sup> 2013, as Appendix 1, within the document titled "Stewardship of Enlist Duo Herbicide". This document was assigned MRID No. 49199102. The PUG will be finalized following registration approval of Enlist Duo.

**6. The Agency needs a non-CBI version of the Stewardship framework posted in the docket as supporting material for the proposed regula**

Response: The attached document "Framework for Enlist Duo Herbicide Management Plan.pdf" provides a non-CBI version of the Enlist Duo Herbicide Management Plan that can be posted in the docket as supporting material for the proposed regulatory decision.

For any question on this regard, please do not hesitate to contact me.

Sincerely,

*Diego Fonseca* Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

Dow AgroSciences LLC  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)







March 7, 2014

### **Framework for Enlist Duo Herbicide Management Plan**

Dow AgroSciences (DAS) has applied to the U.S. Environmental Protection Agency (EPA) for registration of Enlist Duo, a proprietary blend of two currently registered herbicides – glyphosate and 2,4-D choline. DAS has also applied to the U.S. Department of Agriculture (USDA) for deregulation of Enlist corn and soybean crops that are designed to tolerate application of Enlist Duo.

Use of Enlist Duo herbicide in conjunction with Enlist crops is intended to help farmers manage glyphosate-resistant and other hard-to-control weeds. The proprietary Colex-D Technology included in Enlist Duo is designed to provide ultra-low volatility, minimized potential for physical drift, decreased odor, plus improved handling and tank mixing characteristics – properties intended to provide positive environmental, agronomic, and user benefits.

DAS has created a management program for its Enlist products to be implemented upon commercialization. DAS's program is composed of interlocking elements intended to work collectively with the terms and conditions of EPA registration to ensure the proper use and sustainability of the Enlist products. Key elements of DAS's program will include provisions intended to assure that growers use:

- Enlist Duo responsibly in order to sustain the long-term performance of Enlist Duo by minimizing the potential for significant levels of weed resistance; and
- Only DAS Authorized Herbicide Products, *i.e.*, products that contain either 2,4-D herbicides featuring Colex-D Technology, AOPP herbicides or both that are expressly labeled for use in conjunction with Enlist crops and specified in the DAS Product Use Guide (PUG).

DAS anticipates continuing to refine and improve many of the elements of this management program once experience is gained with Enlist technology and data gathered from actual commercial use. The centerpiece of the program will always be the EPA-approved herbicide label and the DAS Technology Use Agreement (TUA), which all growers will be required to sign in order to obtain Enlist Seed.

The two major components of the DAS management program are summarized below.

#### Herbicide Selection and Control Program

To help ensure that 2,4-D formulations used in conjunction with Enlist corn and soybeans are only those that contain Colex-D Technology, DAS has developed a set of five interlocking management program elements. These are:





1. Product Labeling – The proposed Enlist Duo herbicide product label submitted to EPA by DAS prominently states that 2,4-D products that do not contain Colex-D Technology are not authorized for use in conjunction with Enlist corn and soybeans. DAS plans to include language on the Enlist Seed bag that will reinforce this herbicide label requirement.
2. Contractual Obligations – the TUA is a legally binding contract which all growers will be required to sign in order to obtain Enlist Seed. In the TUA, seed purchasers contractually commit that they will not use 2,4-D products without Colex-D Technology in conjunction with Enlist crops. By signing the TUA growers also agree to comply with the current DAS PUG, which will detail requirements and recommendations for the planting of Enlist crops and the proper use of Enlist Duo with Colex-D Technology. Additionally, the PUG provides guidance on weed resistance management. The latest version of the PUG is automatically provided each year to all growers with a signed TUA.
3. Grower, Applicator and Retailer Education – DAS has created specific programs to educate growers, applicators and retailers on the benefits, best practices, and legal obligations associated with the use of Enlist technology. These programs will help ensure that growers, applicators and retailers are properly educated before purchasing or selling any Enlist product.
4. Compliance Monitoring – DAS has created a program to track sales of Enlist products and monitor grower compliance with the requirements of the TUA and PUG.
5. Marketing Incentives – DAS expects to implement a marketing program to provide, through financial incentives and positive value, additional motivation for growers to select the proper herbicide for use in conjunction with Enlist corn and soybeans. This program will be refined as experience is gained with Enlist technology and data gathered from actual commercial use.

#### Weed Resistance Management Program

Weed management principles from the Weed Science Society of America (WSSA) are a significant part of the Enlist weed resistance management program. One key recommendation from the WSSA is to proactively implement diversified weed control strategies to minimize selection for weed populations resistant to one herbicide. A diversified weed management program may include the use of multiple herbicides with different modes of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using the labeled rate of the herbicide and following directions for use is important to delay selection for resistance.

Enlist Duo combines two different herbicidal modes of action – glyphosate (a Group 9 herbicide) and 2,4-D (a Group 4 growth regulator herbicide) that provides an additional, different mode of action to control glyphosate-tolerant or resistant broadleaf weeds. 2,4-D choline is a new form of 2,4-D that is a component of the Colex-D Technology package designed to provide ultra-low volatility and minimized potential for physical drift, among other characteristics.

Enlist Duo is intended to support easy implementation of effective weed resistance management programs by growers based on premixes, tank mixes and/or herbicide rotation programs that use multiple modes of action to control weed populations. These weed resistance management programs are designed to effectively delay the development of further glyphosate resistance problems in corn and soybean production systems, as well as minimize the potential for the development of significant levels of resistance to 2,4-D.





DAS has developed a set of interlocking weed resistance management program elements that include best management practices such as those recommended by WSSA. The three major elements of this weed resistance management program are outlined below.

- **Herbicide Product Labeling** - The Enlist Duo herbicide product label submitted by DAS contains comprehensive information and requirements for responsible use of the herbicide for control of weeds in Enlist crops. These requirements are also designed to minimize the potential for weed resistance development. The product label includes specific herbicide resistance management practices.
- **Contractual Obligations** - Imposed by way of the DAS Technology Use Agreement (TUA) and the DAS Product Use Guide (PUG) which is incorporated by reference in the TUA.
- **Grower, Applicator and Retailer Education** - DAS has created specific programs to educate growers, applicators and retailers on the importance of a comprehensive weed resistance management program and how to practically implement such programs.

## Schmid, Emily

---

**From:** Fonseca, Diego (D) [dfonseca@dow.com]  
**Sent:** Friday, March 07, 2014 4:05 PM  
**To:** Montague, Kathryn V.  
**Cc:** Schmid, Emily; Kenny, Daniel; Houtman, Bruce (BA); Cuffe, John; Palmer, Damon (M); Krieger, Mark (M)  
**Subject:** Revisions Requested for the Pending Draft Label for 62719-AUO  
**Attachments:** ENLIST request for label revisions to 62719-AUO 02282014.pdf; 062719-XXXXXX.20140307.GF-2726-AUO 07Mar14dW-Ed.pdf; 062719-XXXXXX.20140307.GF-2726-AUO 07Mar14d.pdf

Dear Kay,

In response to the EPA OPP letter (1<sup>st</sup> attachment) received last February 28<sup>th</sup>, Dow AgroSciences is respectfully submitting a revised draft label of Enlist Duo Herbicide. Two copies of Enlist Duo label are attached as follows:

- Label copy with edits, pdf document (2<sup>nd</sup> attachment).
- Clean label copy, pdf document (3<sup>rd</sup> attachment).

The newest label version dated 7<sup>th</sup> March 2014, includes the following changes:

1. Text changed in several places as requested in EPA's letter.
  - a. Crops Selection and Cultural Practices section: DAS agrees to make change requested although we suggested alternate language by adding a new bullet. "Scout fields before application to ensure herbicides and rates will be appropriate for the weed species and weed sizes present."
2. New additions:
  - a. Addition on first page below product description: "2,4-D products that do not contain Colex-D Technology are not authorized for use in conjunction with Enlist corn and soybeans".
3. Counterproposals:
  - a. Protection of Sensitive Areas section: Proposed a reworded and expanded list of non-sensitive areas.
  - b. Spray pressure: Proposed the use of "not to exceed 40 psi" as this would be more practical language for applicators and achieve the same result.

For any question on this regard, please do not hesitate to contact me.

Sincerely,

*Diego Fonseca* Regulatory Manager

Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**

9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



**Dow AgroSciences**

| *Solutions for the Growing World*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

FEB 24 2014

Mr. Diego Fonseca  
Dow Agrosciences, LLC  
9330 Zionsville Rd.  
Indianapolis, IN 46268-1054

Subject: Additional Information Requested for the Pending Registration of Enlist Duo Herbicide (62719-AUO)

Dear Diego,

Per our teleconference on February 13, 2014, we are requesting some additional information in order to proceed with the review of your proposed registration of Enlist herbicide for use on Enlist 2,4-D tolerant corn and soybeans:

1. The Agency requests that Dow provide details on the calculations used to arrive at the 60-foot buffer zone, currently on the draft proposed label. *- changed to okay?*
2. The following revisions are needed for the pending draft label for 62719-AUO(version 20140123):
  - Revise the "Protection of Sensitive Areas" section as follows: "To ensure the protection of threatened or endangered species, residues of this product from spray drift must be below levels of concern for threatened and endangered species for any area adjacent to the application site that is not excluded as possible habitat for these organisms. You must maintain a 60 foot upwind buffer from any area that is not 1. the paved or gravel surface of maintained roads, 2. other paved surfaces, 3. planted row crops, or 4. areas covered by the footprint of a building, shade house, green house, silo, feed crib, or other man made structure with walls and or roof."
  - Users MUST report to Dow any incidents of non-performance/resistance (instead of or in addition to retailer, extension, etc.)
  - Insert the following language "Use AIXR 110-04 spray nozzles with proper tank mix and pressure at  $40 \pm 2$  psi to reduce Enlist Duo Herbicide driftable fines" in the Spray Drift Management section, and remove the current table listing multiple nozzle types

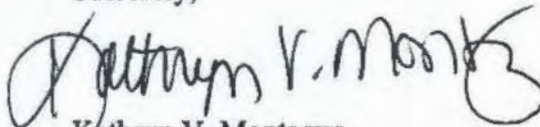
- Additional revisions may be necessary prior to final Agency approval of this label
3. The Agency needs additional details pertaining to Dow's strategy for determining/ensuring grower compliance with TUA:
    - The Agency needs to see a protocol for this strategy, including the following:
      - o Sampling strategy for surveying "flagged" population (e.g., those who purchase seed but do not purchase Enlist Duo herbicide)
        - Will it be a random vs stratified sample?
          - e.g. will it focus on "hot list" growers - ones who live in areas where they have glyphosate resistance (and should therefore be using ENLIST DUO, not a straight glyphosate product), or ones whose "reputation" indicates a history of not complying with BMPs
        - What will the survey questions include?
      - More detailed information on Dow's follow-up actions
        - o On-farm assessment
          - Will this be done for every "hot list" grower or subset/sample of them?
            - If sample, how chosen?
        - o What are the consequences for a grower determined to be non-compliant?
          - e.g., Repeat offenders - will they lose ability to use technology? How many "strikes and you're out"?
      - Annual reporting to Agency on % compliance (by Nov. 1 of each year)
      - Dow will need to notify the Agency of any changes to the TUA and/or PUG after registration
  4. The Agency needs additional information on Dow's strategy for ensuring detection/management of resistance:
    - How will Dow track if growers are following good resistance management practices?
      - o Use of sales information to track rotation of MOAs?
    - Dow reaction if users repeatedly use technology/no rotation
    - Response to detections of resistance
    - Annual reporting to Agency (by 11/1 of each year)
      - o Reports of actual resistance fall under 6(a)(2)
  5. The Agency requests that Dow provide us with the most current Product Use Guide



6. The Agency needs a non-CBI version of the Stewardship framework which can be posted in the docket as supporting material for the proposed regulatory decision

If you have any questions, please contact Kathryn Montague (703-305-1243 or [montague.kathryn@epa.gov](mailto:montague.kathryn@epa.gov) ).

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague", with a stylized flourish at the end.

Kathryn V. Montague  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)



**Dow AgroSciences**

MRID # 49199100

9330 Zionsville Road Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)

308/2E  
October 22, 2013

Document Processing Desk (DATA)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION

Dow AgroSciences is respectfully submitting complementary information (for the review of GF-2726 (62719-AUO) as agreed during the EPA-DAS meeting last August 20th, 2013 (items # 4, 5 and 6 on e-mail enclosed).

Dow AgroSciences is submitting this submission electronically (e-PRISM.xml Data Submission for GF-2726).

**Contents of Submission**

**Volume**

Volume 1  
(Administrative)

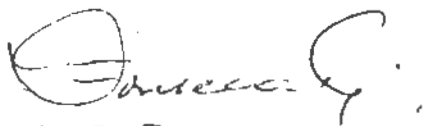
**Contents**

- Transmittal document (this letter)
- Copy of e-mail dated August 23rd, 2013 with summary and consensus reached in the August 20th meeting between EPA and DAS, for the registration review of Enlist herbicide (GF-2726; EPA Action: 62719-AUO)
- CD containing e-PRISM.xml – New Section 3

<u>Volume</u> <u>Guideline No.</u>	<u>MRID NO.</u>	<u>Study</u>
Volume #2 N/A	49199101	Extrapolation of the Drift Reduction Potential of Enlist Duo Herbicide to Additional Nozzles by Validation with Field Drift Deposition Data Havens, P.L. 25-Sep-2013  Study ID: 131192 Pages: 1-41 (1 PDF copy) Stewardship of Enlist Duo™ Herbicide  Gilbert, K.S.; Smith, A.J.; Stautz, J. A. 25-Sep-2013  Study ID: DAS100213 Pages: 1-28 (1 PDF copy)
Volume #3 N/A	49199102	

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Stacy Robinson, Regulatory Specialist at 317-337-5635 (srobinson@dow.com).

Sincerely,



Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
dfonseca@dow.com

Enclosures

DF/kh



# Fee for Service

{942729G~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies? ☐ Fee Waiver?  
☐ volpay % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 23

Receipt No.

S-

942729

EPA File Symbol/Reg. No.

62719-AUO

Pin-Punch Date:

10/24/2013

☒ This item is NOT subject to FFS action.

## Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

## Parent/Child Decisions:

☒ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: 

Date: 10/30/13

Remarks:

*resubmission of addtl information*

**E-SUBMISSION**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

October 30, 2013

OFFICE OF CHEMICAL  
SAFETY  
AND POLLUTION  
PREVENTION

BRUCE A. HOUTMAN  
DOW AGROSCIENCES LLC  
9330 ZIONSVILLE RD 308/2E  
INDIANAPOLIS, IN 46268-1054

PRODUCT NAME: GF-2726  
COMPANY NAME: DOW AGROSCIENCES LLC  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 62719-AUO  
EPA RECEIPT DATE: 10/24/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-1243.

Sincerely,

A handwritten signature in black ink, appearing to be "SJA".

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division



**Montague, Kathryn V.**

---

**From:** Fonseca, Diego (D) [dfonseca@dow.com]  
**Sent:** Tuesday, August 06, 2013 9:35 AM  
**To:** Montague, Kathryn V.  
**Cc:** Walsh, Michael; Kenny, Daniel  
**Subject:** MRID No. 49163301  
**Attachments:** RE: MRID in front end screen; TD GF-2726 Spray Chamber.pdf; 49163301 GF-2726 Spray Chamber.pdf

Hi Kay. Please find attached a complimentary copy of paper: "Spray Chamber Droplet Size Distributions for GF-2726 Herbicide with Various Spray Nozzles". This paper was prepared with the objective to provide the EPA RD and EFED with specific information on GF-2726 (62719-AUO) when sprayed with several different nozzles, as per discussed last May 1<sup>st</sup>, during the EPA – DAS meeting on Enlist. This paper was initially submitted to EPA last Jul 2<sup>nd</sup>, but got lost at the Front End, as you can see from e-mail attached. Then it was re-submitted last Aug 1<sup>st</sup>.

I will appreciate your help to make this paper available to EFED as soon as possible. Regards,

**Diego Fonseca** Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



DP #457755  
sent 8/6/13  
to EEB1

# DATA PACKAGE BEAN SHEET

Date: 06-Aug-2013

Page 1 of 1

Decision #: 457755

DP #: (413839)

PRIA

Parent DP #:

Submission #: 919310

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: 62719-AUO - GF-2726

Company: 62719 - DOW AGROSCIENCES LLC

Risk Manager: RM 23 - Kathryn Montague - (703) 305-1243 Room# PY1 S-7332

Risk Manager Reviewer: Kathryn Montague KMONTAGU

Sent Date: 28-Jun-2012

PRIA Due Date: 28-Feb-2014

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (R311) NEW PRODUCT;APPLICANT-INITIATED 2;EXCLUDES APPROVAL OF SAFENERS ;

Ingredients: 051505, 2, 4-D, Choline salt(24.4%)

103608, Glycine, N-(phosphonomethyl)-, compd. with N-methylmethanamine (1:1)(22.1%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 06-Aug-2013

Due Back: \_\_\_\_\_

DP Ingredient: 103608, Glycine, N-(phosphonomethyl)-, compd. with N-methylmethanamine (1:1)

051505, 2, 4-D, Choline salt

DP Title: \_\_\_\_\_

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: \_\_\_\_\_

Assigned To

Date In

Date Out

Organization: EFED / ERB1

Last Possible Science Due Date: 30-Nov-2013

Team Name: \_\_\_\_\_

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

Can be printed on its own page

## \*\*\* Data Package Instructions \*\*\*

FOR MRID #49363301 (in documentum and also sent via email) - please review Dow's study re: spray chamber droplet size distributions for GF-2726 using various nozzles. This is part of the 2,4-D ENLIST action.

Thanks,  
Kay Montague  
305-1243

Recommendation of Division Directors Negotiated Due Dates			
Decision #: 457755		Registration #: 62719-AUO	
		Petition #:	
<input type="checkbox"/> See page 2 for additional registration entries			
Chemical Name: 2,4-D Choline Salt + Glyphosate			
Fee Category: R311		PRIA Decision Time Frame: 12 months	
Submitted by: Michael Walsh		Branch: OCSPP/OPP/RD	Date: 07/23/2013
Company: Dow AgroSciences, LLC			
Original PRIA Due Date: 12/07/2012		Proposed New PRIA Due Date: 02/28/2014	
Previous Negotiated Due Dates: 03/01/2013 08/01/2013			
Is the "Fix" in-house? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> n/a      If not, date "Fix" expected:			
Negotiated Due Date Reason:			
Additional Data Required	<input type="checkbox"/> Product Chemistry	<input type="checkbox"/> Toxicology	<input type="checkbox"/> Acute Tox
	<input type="checkbox"/> Efficacy	<input type="checkbox"/> Ecological	<input type="checkbox"/> Residue
Data Deficiencies	<input type="checkbox"/> Product Chemistry	<input type="checkbox"/> Acute Tox	<input type="checkbox"/> Efficacy
	<input type="checkbox"/> Environmental	<input type="checkbox"/> Ecological	<input type="checkbox"/> Labeling
Late Risk Assessment	<input type="checkbox"/> Human Health	<input type="checkbox"/> Ecological	
Interim Consideration	<input type="checkbox"/> Agency Initiated	<input type="checkbox"/> Registrant Initiated	
<input type="checkbox"/> CSF	<input type="checkbox"/> Public Process	<input type="checkbox"/> Risk Issues Environmental	<input type="checkbox"/> Risk Issues Human Health
<input type="checkbox"/> Impurities Review	<input type="checkbox"/> Label	<input type="checkbox"/> Administrative-FR Notice	<input type="checkbox"/> Other – Comment Field
Summary of Deficiency Type(s): <input type="checkbox"/> Not Submitted (N) <input type="checkbox"/> Deficiencies (D)			
Product Chemistry: <input type="checkbox"/> Acute Tox: <input type="checkbox"/> Efficacy: <input type="checkbox"/> Labeling: <input type="checkbox"/> Ecological Data: <input type="checkbox"/> Other (describe): <input checked="" type="checkbox"/>			
USDA Trait Deregulation for ENLIST AAD-1 corn is pending.			
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): Communication with Dow AgroSciences regarding the proposed use of 2,4-D choline salt on herbicide-tolerant corn is ongoing. OPP and USDA continue to coordinate, communicate, and share information on the proposed trait deregulation decision and the status of EPA's reviews.			
"75 Day" Letter sent? <input type="checkbox"/> Yes, Date sent <input checked="" type="checkbox"/> No and reason for none? Add comments on page 2			
Rationale for Proposed Due Date: Proposed by registrant. USDA Trait Deregulation pending.			
Registrant notified that this is the last negotiation? <input type="checkbox"/> Yes <input type="checkbox"/> Not Applicable			
Approve: <input checked="" type="checkbox"/>		Disapprove: <input type="checkbox"/>	
If disapproved, action to be taken:			
OD or DOD Signature: CN=Marty Monell/OU=DC/O=USEPA/C=US			Date: 07/24/2013

Decision #:	Registration #:	Petition #:

**Issue(s) (describe in detail):**

USDA Trait Deregulation is pending. USDA must deregulate the trait before OPP can make any decisions regarding the proposed use of 2,4-D on genetically-modified corn.

This submission has been identified by the Office of Pesticide Programs as an action of significant public interest and will be subject to Public Process.

USDA recently announces its intent to develop an Environmental Impact Statement (EIS) for this proposed use. The EIS may take additional time, and another renegotiation of this action is likely.

**Comment(s):**



# Audit Trail for

## Recommendation of Division Directors Negotiated Due Dates

**PDF Name:** PRIAv5.pdf

**Form Number:** PRIA

**Document Identifier:** PRIA-13204154426-MW

SUBMITTED on 07/23/2013 at 04:03:26 PM by CN=Michael Walsh/OU=DC/O=USEPA/C=US

APPROVED on 07/23/2013 at 04:15:16 PM by CN=Dan Kenny/OU=DC/O=USEPA/C=US

APPROVED on 07/23/2013 at 06:03:14 PM by CN=Lois Rossi/OU=DC/O=USEPA/C=US

APPROVED AND COMPLETED on 07/24/2013 at 06:55:09 AM by CN=Marty Monell/OU=DC/O=USEPA/C=US



## Walsh, Michael

---

**From:** Fonseca, Diego (D) [dfonseca@dow.com]  
**Sent:** Tuesday, July 23, 2013 3:23 PM  
**To:** Walsh, Michael  
**Subject:** RE: 2,4-D Enlist Action due dates. Renegotiation required.

Hi Mike. Yes, a new PRIA date needs to be agreed for all four actions (62719-AUO; 62719-640; 62719-AGO; and 62719-AUU) as listed in your e-mail below. So, according to current and future events as related with the review process of these four registration actions, DAS proposes to set February 28, 2014 as the new PRIA date for all of them. I will appreciate a confirmation e-mail on this subject.

Best regards,

**Diego Fonseca** Regulatory Manager  
Office: 317 337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

Dow AgroSciences LLC  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



---

**From:** Walsh, Michael [<mailto:Walsh.Michael@epa.gov>]  
**Sent:** Tuesday, July 16, 2013 12:00 PM  
**To:** Fonseca, Diego (D)  
**Subject:** 2,4-D Enlist Action due dates. Renegotiation required.

Hi Diego.

I just left a voice mail for you, but I also wanted to send an email regarding the approaching due dates for the 2,4-D Enlist actions, and the need to renegotiate these dates with you.

Our records indicate the due dates are as follows:

62719-AUO	Due 8/1
62719-640	Due 8/1
62719-AGO	Due 8/31
62719-AUU	Due 8/31

Please let me know your thoughts on the matter.

Thanks.

-Mike



Dow AgroSciences

MRID # 49163300

9330 Zionsville Road Indianapolis, IN 46258

www.dowagro.com

308/2E  
July 2, 2013

Document Processing Desk (DATA)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION

Enclosed is data in support of the Dow AgroSciences registration for GF-2726. Dow AgroSciences is respectfully submitting additional data as follow up of the May 1st, 2013 meeting, in order to qualify nozzles to be used with GF-2726 (Enlist Duo). This report summarizes the results of 39 nozzles in a spray chamber that measured the spray droplet size spectra of GF-2726 Herbicide, employing methods described in ASTM Standard Test Method E2798-11.

Dow AgroSciences is submitting this submission electronically (e-PRISM xml Data Submission for GF-2726).

Contents of Submission

Volume

Volume 1  
(Administrative)

Contents

- Transmittal document (this letter)
- EPA Form 8570-1, Application for Pesticide
- General Summaries for Public Release (1 Study)
- CD containing e-PRISM.xml - New Section 3

Volume

Guideline No.

Volume #2  
N/A

MRID NO.

49163301

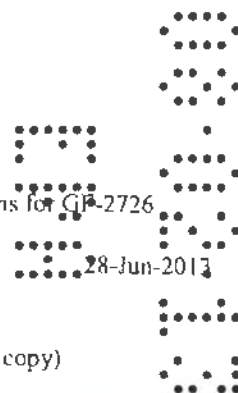
Study

Spray Chamber Droplet Size Distributions for GF-2726  
Herbicide with Various Spray Nozzles  
Qin, K.; Havens, P.L.

Study ID: 131020

Pages: 1-23

(1 PDF copy)



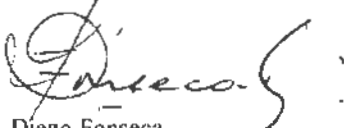
E-SUBMISSION

KATHRYN MONTAGUE/PM-23  
GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUG  
DATA SUBMISSION  
JULY 2, 2013

Page 2

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Stacy Robinson, Regulatory Specialist at 317-337-5635 (srobinson@dow.com).

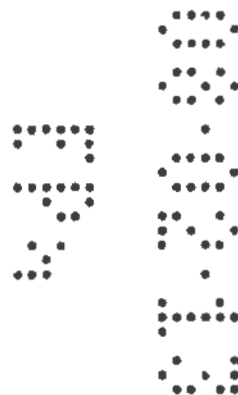
Sincerely,



Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
dfonseca@dow.com

Enclosures

DF/kh





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-AUO	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/GF-2726	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Enclosed is data in support of the Dow AgroSciences registration for GF-2726. Dow AgroSciences is respectfully submitting additional data as follow up of the May 1st, 2013 meeting, in order to qualify nozzles to be used with GF-2726 (Enlist Duo).

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Diego Fonseca		Title Regulatory Leader	Telephone No. (Include Area Code) (317)337-4698
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.			5. Date Application Received (Stamped) 
2. Signature 		3. Title Regulatory Leader	
4. Typed Name Diego Fonseca (dfonseca@dow.com)		5. Date July 2, 2013	

62719-640

6/18/2013

1/3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

**CERTIFIED MAIL**

JUN 18 2013

Mr. Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
Dow AgroSciences, LLC  
9330 Zionsville Road  
Indianapolis, IN 46268-1054

Subject: Response to Agency Action Dated April 2, 2013 Requiring Revisions to the  
Supplemental Label for AAD-12 Soybean Research, Field Trials, and Seed  
Production

Product Name: GF-2727  
EPA Registration Number: 62719-640  
Decision Number: 478060  
Submission Date: April 19, 2012

Dear Mr. Fonseca:

The supplemental label amendment referred to above, submitted in connection with  
registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended  
is acceptable.

**You are required to distribute the label to those conducting research, field trials,  
and seed production activities within 30 days of the date on this letter.**

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure



# Supplemental Labeling



Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

## GF-2727

EPA Reg. No. 62719-640

For use only by Dow AgroSciences employees, licensees, contractors and applicators working under Dow AgroSciences' supervision, and University Weeds Scientists and staff under research testing agreement with Dow AgroSciences, on 2,4-D and glyphosate-tolerant soybeans containing AAD-12 expressing events grown for research, field trials, and seed production, including USDA regulated plantings or seed production. Treated Commodities are not allowed for sale or consumption before the USDA deregulation of AAD-12 soybeans.

### ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling, as well as the GF-2727 container labeling, must be in the possession of the user at the time of application.
- Read the label affixed to the container for GF-2727 before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of GF-2727 according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for GF-2727.

This supplemental label expires on June 15, 2015, and must not be used or distributed after this date.

### Directions for Use

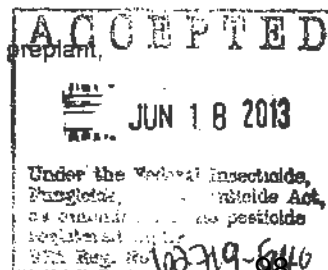
Refer to product label for GF-2727 for General Use Precautions, Restrictions and Application Instructions

This product is only for the control of labeled weeds and non-2,4-D/glyphosate tolerant soybean plants in research, field trials, and seed production, including USDA regulated plantings, or seed production fields of soybean containing AAD12 expressing events plus a glyphosate-tolerant trait. Injury or destruction of the soybeans will occur if soybeans not designated as 2,4-D/glyphosate-tolerant are treated with this product. 2,4-D-tolerant AAD12 soybean contains patented technology licensed exclusively to Dow AgroSciences. Planting of 2,4-D-tolerant soybean containing AAD12 expressing events may only be done under agreement with and following all instructions of Dow AgroSciences.

Apply up to 4.75 pints of this product in a spray volume of 5 gallons or more per acre for ground equipment. A second application, with a minimum of 12 days between applications, at up to 4.75 pints per acre may be applied, if needed to control weeds or non-2,4-D and glyphosate tolerant soybean plants.

Avoid off-target movement to avoid injury to desirable plants. Refer to the GF-2727 main label for information regarding application recommendations and restrictions.

**Application Timing:** GF-2727 may be applied to 2,4-D/glyphosate-tolerant soybean preplant, preemergence and postemergence up to R2 (full flowering stage).



**Restrictions:**

- For use only by Dow AgroSciences employees, licensees, contractors and applicators working under Dow AgroSciences' supervision, and University Weed Scientists and staff under research testing agreement with Dow AgroSciences.
- **Maximum Seasonal Use Rate:** Do not exceed a maximum rate of 9.5 pints of GF-2727 per acre per crop season.
- No portion of the treated plants may be used for human or animal consumption and cannot be used or processed for food or feed. Soybean plants must be destroyed post-harvest. Do not use soybean plants containing AAD-12 expressing events for fodder or hay. Harvested seed of treated soybean containing AAD-12 expressing events cannot be used or processed for food or feed.
- **Chemigation:** Do not apply this product through any type of irrigation system.
- Do not apply this product aerially.

**Note:** This product is toxic to fish and aquatic invertebrates. Refer to the Environmental Hazards section of the product label attached to the product container for required protective measures.

®Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

R896-002

EPA accepted: \_\_\_/\_\_\_/\_\_\_

Replaces R896-001

**Recommendation of Division Directors  
Negotiated Due Dates**

<b>Decision #:</b> 457755	<b>Registration #:</b> 62719-AUO	<b>Petition #:</b>
<input type="checkbox"/> See page 2 for additional registration entries		
<b>Chemical Name:</b> 2,4-D Choline Salt + Glyphosate		
<b>Fee Category:</b> R311		<b>PRIA Decision Time Frame:</b> 12 months
<b>Submitted by:</b> Michael Walsh	<b>Branch:</b> OCSPP/OPP/RD	<b>Date:</b> 02/28/2013
<b>Company:</b> Dow AgroSciences, LLC		
<b>Original PRIA Due Date:</b> 12/07/2012		<b>Proposed New PRIA Due Date:</b> 08/01/2013
<b>Previous Negotiated Due Dates:</b> 03/01/2013		
<b>Is the "Fix" in-house?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> n/a		<b>If not, date "Fix" expected:</b>
<b>Negotiated Due Date Reason:</b>		
<b>Additional Data Required</b>	<input type="checkbox"/> Product Chemistry <input type="checkbox"/> Toxicology <input type="checkbox"/> Acute Tox <input type="checkbox"/> Environmental <input type="checkbox"/> Efficacy <input type="checkbox"/> Ecological <input type="checkbox"/> Residue <input checked="" type="checkbox"/> Other	
<b>Data Deficiencies</b>	<input type="checkbox"/> Product Chemistry <input type="checkbox"/> Acute Tox <input type="checkbox"/> Efficacy <input type="checkbox"/> Residue <input type="checkbox"/> Toxicology <input type="checkbox"/> Environmental <input type="checkbox"/> Ecological <input type="checkbox"/> Labeling <input type="checkbox"/> Other <input type="checkbox"/> Not Submitted	
<b>Late Risk Assessment</b>	<input type="checkbox"/> Human Health <input type="checkbox"/> Ecological	
<b>Interim Consideration</b>	<input type="checkbox"/> Agency Initiated <input type="checkbox"/> Registrant Initiated	
<input type="checkbox"/> CSF	<input type="checkbox"/> Public Process	<input type="checkbox"/> Risk Issues Environmental <input type="checkbox"/> Risk Issues Human Health
<input type="checkbox"/> Impurities Review	<input type="checkbox"/> Label	<input type="checkbox"/> Administrative-FR Notice <input type="checkbox"/> Other - Comment Field
<b>Summary of Deficiency Type(s):</b> <input type="checkbox"/> Not Submitted (N) <input type="checkbox"/> Deficiencies (D)		
<b>Product Chemistry:</b> <input type="checkbox"/> <b>Acute Tox:</b> <input type="checkbox"/> <b>Efficacy:</b> <input type="checkbox"/> <b>Labeling:</b> <input type="checkbox"/> <b>Ecological Data:</b> <input type="checkbox"/> <b>Other (describe):</b> <input checked="" type="checkbox"/>		
Complete storage stability data is required, only interim data has been submitted. USDA Trait Deregulation for ENLIST AAD-1 corn is pending.		
<b>Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates):</b>		
There are ongoing communications between Dow and OPP (Office Director, RD, EFED, HED, and BEAD) regarding the use of 2,4-D choline salt on herbicide-tolerant ENLIST AAD-1 corn. There have been numerous post-submission meetings. OPP and USDA continue to coordinate, communicate, and share information on trait deregulation decision and and EPA science reviews		
<b>"75 Day" Letter sent?</b> <input type="checkbox"/> Yes, Date sent <input checked="" type="checkbox"/> No and reason for none? Add comments on page 2		
<b>Rationale for Proposed Due Date:</b> Additional data required. USDA Trait Deregulation pending.		
<b>Registrant notified that this is the last negotiation?</b> <input type="checkbox"/> Yes <input type="checkbox"/> Not Applicable		
<b>Approve:</b> <input checked="" type="checkbox"/>		<b>Disapprove:</b> <input type="checkbox"/>
<b>If disapproved, action to be taken:</b>		
<b>OD or DOD Signature:</b> CN=Marty Monell/OU=DC/O=USEPA/C=US		<b>Date:</b> 03/01/2013

Decision #:	Registration #:	Petition #:

**Issue(s) (describe in detail):**

USDA AAD-1 ENLIST CORN TRAIT DEREGULATION IS PENDING. USDA must deregulate the trait before OPP can make any decisions regarding the proposed use of 2,4-D on genetically-modified corn.

There have been numerous meetings with Dow to discuss the use of 2,4-D choline salt on AAD-1 corn. Communications continue.

Storage stability data must be provided by the registrant. The endangered species review may also require additional information.

This activity has been identified as a matter of significant public interest, and will be Public Process. An additional renegotiation is likely.

**Comment(s):**

No new or amended tolerances are proposed for this action.

The Agency has requested additional information from Dow AgroSciences.

The registrant has proposed the renegotiated PRIA due date of August 1, 2013.

# **Audit Trail for**

## **Recommendation of Division Directors Negotiated Due Dates**

**PDF Name:** PRIAv5.pdf

**Form Number:** PRIA

**Document Identifier:** PRIA-13059075955-MW

SUBMITTED on 02/28/2013 at 08:18:12 AM by CN=Michael Walsh/OU=DC/O=USEPA/C=US

APPROVED on 02/28/2013 at 09:57:45 AM by CN=Dan Kenny/OU=DC/O=USEPA/C=US

APPROVED on 02/28/2013 at 10:29:37 AM by CN=Dan Rosenblatt/OU=DC/O=USEPA/C=US

APPROVED AND COMPLETED on 03/01/2013 at 07:11:28 AM by CN=Marty Monell/OU=DC/O=USEPA/C=US





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

**FEE**

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUOa DECISION NO.: 457755  
PC Code(s): 051505,103608 ACTION CODE: R311  
FOOD Use: Yes

DATE OUT: December 13, 2012

SUBJECT: End Use Product Chemistry Review  
Product Name: GF-2726

FROM: Hari Mukhoty  
Product Chemistry Team  
Technical Review Branch / Registration Division (7505P)

TO: Michael Walsh, CRM / Kathryn Montague PM - 23  
Herbicide Branch / Registration Division (7505P)

Company Name: Dow AgroSciences LLC  
Formulation Type: Not provided.

**INTRODUCTION:**

The registrant has submitted one basic CSF (Dated: 09/12/2011), one amended CSF (dated: 11/28/2011) to the aforesaid basic as alternate formulation (Alt. # 1) and proposed a product specific label for the registration of the aforesaid product under EPA File Symbol No. 62719-AUO. The registrant submitted product chemistry Group A and Group B data under MRID(s): 486441-01 and 482898-02.

The applicant has requested the registration of the proposed product under PRIA 311 requirements.

TRB has been requested to evaluate the product chemistry data required for registration of the proposed product.

**SUMMARY OF FINDINGS:**

1. Name of Active Ingredient(s): Glyphosate DMA Salt (22.1%) and 2,4-Dichlorophenoxyacetic acid choline salt (24.4%).
2. Has the registrant claimed substantial similarity to registered product?  
☐ Yes ☒ No ☐ NA If yes: EPA Reg. No.
3. The source material(s) of the active ingredient(s) is/are registered with the Agency.
4. All inert ingredients have been approved by IIAB on 12/13/2012 for food uses (Pre-Harvest Application).
5. The CSFs of the proposed basic and alternate formulation has been filled out completely and correctly.

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUOa DECISION NO.: 457755  
PC Code(s): 051505,103608 ACTION CODE: R311  
FOOD Use: Yes

6. Confidential Statement of Formula(s):

[X] Basic - Dated: 09/12/2011 re-submitted - Dated: NA  
[X] Alternate Dated: 11/28/2011 re-submitted: Dated: NA

Alternate CSF(s) complies with 40CFR §152.43: [X] Yes [ ] No NA [ ]. Alternate CSF is not acceptable for other changes needed to become acceptable.

7. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concur with product label (PR Notice 91-2)  
[X] Yes

Is the sub statement in compliance with PR Notice 97-6?

[X] Yes [ ] No - Uses the term "Other Ingredients"  
, if not, explain below:

Metallic equivalent: [ ] Yes [X] NA;  
Soluble arsenic: [ ] Yes [X] NA  
Isomeric ratios: [ ] Yes [X] NA  
Acid equivalent: [ ] Yes [X] NA

b. Health related sub statements:

Petroleum distillate at > 10%: [ ] Yes [ ] No [X] NA  
Methanol at > 4%: [ ] Yes [ ] No [X] NA  
Sodium Nitrate / Sodium Nitrite [ ] Yes [ ] No [X] NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

[X] Yes [ ] No The label contains a Physical or chemical hazard statement for containers for mixing, storing and applying for the product.

Total Release Fogger PR Notice 98-6 (40 CFR 156.78 d): [ ] Yes [ ] No [X] NA

d. Label requires an additional Storage and Disposal statement: [X] Yes [ ] No

Final decision of overall label acceptance will be made by the PM.

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUOa DECISION NO.: 457755  
 PC Code(s): 051505,103608 ACTION CODE: R311  
 FOOD Use: Yes

8. Group A: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos. 486441-01
			Yes	No		
830.1550	Product Identity & Composition		X		A	"
830.1600	Description of materials used to produce the product		X		A	"
830.1650	Description of formulation process		X		A	"
830.1670	Discussion on the formation of impurities		X		A	"
830.1700	Preliminary analysis			X	NA	"
830.1750	Certified limits (158.350)	Standard certified Limits	X		A	
		Justification for wider limits				
830.1800	Enforcement analytical method #		X		A	"

A = Acceptance, NA = Not Acceptable, G = Data Gap,

W = Waiver Request, I = In Progress, NA = Not Applicable

# Analytical Method: Liquid Chromatographic method. Validation was performed for accuracy, precision and linearity.

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUOa DECISION NO.: 457755  
 PC Code(s): 051505,103608 ACTION CODE: R311  
 FOOD Use: Yes

9. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos. 482898-02
830.6303	Physical State	Liquid	A	"
830.6315	Flammability	> 212 ° F / > 100° C	A	"
830.6316	Explosibility	Not potentially explosive	A	"
830.7000	pH	6.17	A	"
830.7300	Density	1.1676 g/mL	A	"

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request,  
 NA = Not applicable, I = In progress.

**CONCLUSIONS:**

1. TRB has reviewed the CSFs (dated: 09/12/2011 & 11/28/2011) for the proposed basic and alternate formulation and has found them to be acceptable. The CSFs will be is attached with this review and could be located in OPPIN CHEM DOCS.
2. Product chemistry Group A and Group B data, with the exception of one year storage stability (830.6317) and corrosion characteristics (830.6320) data are satisfied and acceptable.
3. The registrant must generate one year storage stability (830.6317) and corrosion characteristics (830.6320) data on the proposed product. It is required that the observations be made at 0, 3, 6, 9, and 12 month intervals. The results must be submitted to the Agency in electronic and hard copy format.
4. The proposed label was screened as it pertains to the product chemistry requirements. The proposed label contains a Physical or Chemical hazards statement. The PM should request for Formulation Type information from the registrant. The final review of the proposed label and uses are the purview of the PM team.

308/2E  
December 4, 2012



Document Processing Desk (DATA)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)  
Dan Kenny (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION

Dow AgroSciences is respectfully submitting two additional documents in support of our pending application for registration of GF-2726, as agreed with OPP RD during the meeting held November 27, 2012.

**Contents of Submission**

Volume No.	Administrative Contents
Volume 1	<ul style="list-style-type: none"><li>▪ Transmittal document (this letter)</li><li>▪ EPA Form 8570-1, Application for Pesticide</li><li>▪ Draft Enlist™ Product Use Guide</li><li>▪ Dow AgroSciences Technology Use Agreement</li></ul>

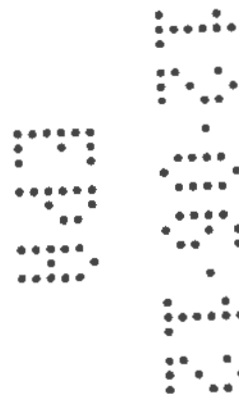
If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Stacy Frank, Regulatory Specialist at 317-337-5635 (sfrank@dow.com).

Sincerely,

A handwritten signature in black ink that reads "Fonseca".

Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
dfonseca@dow.com

Enclosures







United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-AUO	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/GF-2726	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Dow AgroSciences is respectfully submitting two additional documents in support of our pending application for registration of GF-2726, as agreed with OPP RD during the meeting held November 27, 2012.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Diego Fonseca		Title Regulatory Leader	
		Telephone No. (Include Area Code) (347) 337-4693	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature		3. Title Regulatory Leader	
4. Typed Name Diego Fonseca (dfonseca@dow.com)		5. Date December 4, 2012	

308/2E  
December 4, 2012



Document Processing Desk (DATA)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montaguc/PM-23 (7505P)  
Dan Kenny (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION

Dow AgroSciences is respectfully submitting two additional documents in support of our pending application for registration of GF-2726, as agreed with OPP RD during the meeting held November 27, 2012.

**Contents of Submission**

Volume No.	Administrative Contents
Volume 1	▪ Transmittal document (this letter)
	▪ EPA Form 8570-1, Application for Pesticide
49028201	▪ Draft Enlist™ Product Use Guide
49028202	▪ Dow AgroSciences Technology Use Agreement

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Stacy Frank, Regulatory Specialist at 317-337-5635 (slfrank@dow.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Diego Fonseca".

Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
dfonseca@dow.com

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

December 31, 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

DOW AGROSCIENCES LLC  
9330 ZIONSVILLE RD 308/2E  
INDIANAPOLIS, IN 46268-1054

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 06-DEC-12. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

308/2E  
December 4, 2012



Document Processing Desk (DATA)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)  
Dan Kenny (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
DATA SUBMISSION

Dow AgroSciences is respectfully submitting two additional documents in support of our pending application for registration of GF-2726, as agreed with OPP RD during the meeting held November 27, 2012.

**Contents of Submission**

Volume No.	Administrative Contents
Volume I	▪ Transmittal document (this letter)
	▪ EPA Form 8570-1, Application for Pesticide
49028201	▪ Draft Enlist™ Product Use Guide
49028202	▪ Dow AgroSciences Technology Use Agreement

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Stacy Frank, Regulatory Specialist at 317-337-5635 (slfrank@dow.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Diego Fonseca", with a stylized flourish at the end.

Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
dfonseca@dow.com

Enclosures

## Memorandum

Date: 12/31/12

To: PM 23, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
                  ☐ partially accepted submission  
                  ☐ rejected submission



Hi, Mike,  
info from  
Dow on

Pending 2nd  
P.O.G. action GMD  
+T.U.A. Thanks  
Kary



RE: 2,4-D PUG and TUA. BEAD inquiry.

Fonseca, Diego (D)

to:

Michael Walsh

12/20/2012 09:06 AM

Hide Details

From: "Fonseca, Diego (D)" <dfonseca@dow.com>

To: Michael Walsh/DC/USEPA/US@EPA

History: This message has been replied to and forwarded.

#### 6 Attachments



image001.gif image002.gif image003.png image004.jpg das\_tech\_use agreement november\_2012.pdf.pdf



Dow AgroSciences Enlist Product Use Guide Draft 11-27-12.pdf.pdf

Hi Mike. As per you request, please see attached copy of both documents (TUA and PUG), which were sent to EPA's Front End last December 5<sup>th</sup>. This e-mail is also to confirm that these two documents (TUA and PUG), are not considered CBI. So the BEAD reviewer can work on them as per your e-mail below.

**Diego Fonseca** Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



**Dow AgroSciences**

*Solutions for the Growing World*

---

**From:** Walsh.Michael@epamail.epa.gov [<mailto:Walsh.Michael@epamail.epa.gov>]

**Sent:** Wednesday, December 19, 2012 7:48 PM

**To:** Fonseca, Diego (D)

**Subject:** 2,4-D PUG and TUA. BEAD inquiry.

Hi Diego.

Would you please provide me with e-copies of the documents you submitted to Front End Processing where you provide the draft Product Use Guide (PUG) and Technology Use Agreement (TUA) documents to us without them being considered Confidential Business Information (CBI).

If e-copies are not available, would you please confirm that the PUG and TUA are not considered CBI.

I would like to provide your clearance to the BEAD reviewer so he can work on these items during their vacation.

Thank you for your prompt attention to this matter.

-Mike



Recommendation of Division Directors Negotiated Due Dates			
Decision #: 457755		Registration #: 62719-AUO	
		Petition #:	
<input type="checkbox"/> See page 2 for additional registration entries			
Chemical Name: 2,4-D Choline Salt + Glyphosate			
Fee Category: R311		PRIA Decision Time Frame: 12 months	
Submitted by: Michael Walsh		Branch: OCSP/OPP/RD	Date: 12/04/2012
Company: Dow AgroSciences, LLC			
Original PRIA Due Date: 12/07/2012		Proposed New PRIA Due Date: 03/01/2013	
Previous Negotiated Due Dates:			
Is the "Fix" in-house?		If not, date "Fix" expected:	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> n/a			
Negotiated Due Date Reason:			
Additional Data Required	<input type="checkbox"/> Product Chemistry <input type="checkbox"/> Efficacy	<input checked="" type="checkbox"/> Toxicology <input checked="" type="checkbox"/> Ecological	<input type="checkbox"/> Acute Tox <input type="checkbox"/> Residue <input checked="" type="checkbox"/> Other
Data Deficiencies	<input type="checkbox"/> Product Chemistry <input type="checkbox"/> Environmental	<input type="checkbox"/> Acute Tox <input type="checkbox"/> Ecological	<input type="checkbox"/> Efficacy <input type="checkbox"/> Labeling <input type="checkbox"/> Residue <input type="checkbox"/> Other <input type="checkbox"/> Toxicology <input type="checkbox"/> Not Submitted
Late Risk Assessment	<input type="checkbox"/> Human Health <input type="checkbox"/> Ecological		
Interim Consideration	<input type="checkbox"/> Agency Initiated <input type="checkbox"/> Registrant Initiated		
<input type="checkbox"/> CSF <input type="checkbox"/> Impurities Review	<input type="checkbox"/> Public Process <input type="checkbox"/> Label	<input type="checkbox"/> Risk Issues Environmental <input type="checkbox"/> Administrative-FR Notice	<input type="checkbox"/> Risk Issues Human Health <input type="checkbox"/> Other - Comment Field
Summary of Deficiency Type(s): <input checked="" type="checkbox"/> Not Submitted (N) <input type="checkbox"/> Deficiencies (D)			
Product Chemistry: <input type="checkbox"/> Acute Tox: <input type="checkbox"/> Efficacy: <input type="checkbox"/> Labeling: <input type="checkbox"/> Ecological Data: <input type="checkbox"/> Other (describe): <input checked="" type="checkbox"/>			
Additional data requested - ESA + County Identification, phytotoxicity data, complete storage stability data, product use guide + tech use agreement.			
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates):			
Dow is engaged in ongoing discussions with OPP (Office Director, RD, EFED, HED, & BEAD) regarding the use of 2,4-D choline salt on herbicide-tolerant Enlist AAD-1 corn. There have been numerous pre- and post-submission meetings. OPP & USDA continue communication, coordination, and information sharing regarding trait deregulation decision and science reviews.			
"75 Day" Letter sent? <input type="checkbox"/> Yes, Date sent <input checked="" type="checkbox"/> No and reason for none? <i>Add comments on page 2</i>			
Rationale for Proposed Due Date: USDA trait deregulation pending, additional data requested.			
Registrant notified that this is the last negotiation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not Applicable			
Approve: <input checked="" type="checkbox"/>		Disapprove: <input type="checkbox"/>	
If disapproved, action to be taken:			
OD or DOD Signature: CN=Marty Monell/OU=DC/O=USEPA/C=US		Date: 12/05/2012	

Decision #:	Registration #:	Petition #:

**Issue(s) (describe in detail):**

USDA trait deregulation is pending.

There have been many pre-submission and post-submission meetings with Dow to discuss the use of 2,4-D choline salt on Enlist AAD-1 corn, and communications are ongoing.

In a letter dated November 5, 2012 signed by Dan Kenny/Herbicide Branch Chief, the Agency formally requested additional data and information previously discussed with the registrant. These items requested include:

- 1) An endangered species assessment that focuses on the area intended for the first year of use with Enlist corn seed and is in compliance with EPA's "Overview of the Ecological Risk Assessment Process in the Office of Pesticide Programs, U.S. Environmental Protection Agency; Endangered and Threatened Species Effects Determinations" dated January 23, 2004
- 2) Identity of specific counties planned by Dow for the first year of use with Enlist corn seed and coordinating acreage information
- 3) Typical end-use product data addressing phytotoxicity to plants since some of the formulations are mixed with glyphosate (seedling emergence and vegetative vigor studies on the formulated product)
- 4) Full and complete storage stability data for 2,4-DCP use on corn - only interim data has been provided
- 5) Product use guide\*
- 6) Technology use agreement\*
- 7) Magnitude of Residue Bridging Study - though not previously discussed with the registrant, the HED asked for this study referenced in the Interim Storage Stability Study

\*Please note that the draft materials were recently provided to OPP.

**Comment(s):**

USDA must deregulate the trait before OPP can make any decisions regarding the proposed use on genetically modified crops.

No new or revised tolerances are proposed for this action or any of the associated 2,4-D choline salt actions.

The Office Director has determined that this action will be Public Process.

The Agency has requested additional data and information from Dow AgroSciences, as noted above.

The registrant has agreed to the renegotiated PRIA date.



# Audit Trail for

## Recommendation of Division Directors Negotiated Due Dates

**PDF Name:** PRIAv5.pdf

**Form Number:** PRIA

**Document Identifier:** PRIA-12339101629-MW

SUBMITTED on 12/05/2012 at 07:18:03 AM by CN=Michael Walsh/OU=DC/O=USEPA/C=US

APPROVED on 12/05/2012 at 10:39:44 AM by CN=Dan Kenny/OU=DC/O=USEPA/C=US

APPROVED on 12/05/2012 at 10:43:12 AM by CN=Dan Rosenblatt/OU=DC/O=USEPA/C=US

APPROVED AND COMPLETED on 12/05/2012 at 11:38:46 AM by CN=Marty Monell/OU=DC/O=USEPA/C=US



PRIA Renegotiation - Actions: 62719-AUO; 62719-AGO; 62719-640

Fonseca, Diego (D)

to:

Michael Walsh

12/04/2012 09:36 AM

Cc:

Dan Kenny, Kathryn Montague

Hide Details

From: "Fonseca, Diego (D)" <dfonseca@dow.com>

To: Michael Walsh/DC/USEPA/US@EPA

Cc: Dan Kenny/DC/USEPA/US@EPA, Kathryn Montague/DC/USEPA/US@EPA

History: This message has been replied to.

4 Attachments



image001.gif



image002.gif



image003.png



image004.jpg

Mike, considering current PRIA Times for the three actions related to Enlist Corn use (62719-AUO; 62719-AGO; 62719-640), are about to expire, DAS proposes March 1<sup>st</sup>, 2013 as the common PRIA Time for all three. Please confirm receipt and feel free to contact me any time.

Sincerely,

**Diego Fonseca** Regulatory Manager  
Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



**Dow AgroSciences**

*Solutions for the Growing World*

FEE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

DP BARCODE No.: 405955; FILE SYMBOL No.: 62719-AUO; **PRODUCT NAME:** GF-2726;  
**DECISION No.:** 457955; **PC Code(s):** 051505 & 103608; **ACTION CODE:** R311; **FOOD Use:** Yes

**DATE:** October 23, 2012

**SUBJECT:** Product Name: GF-2726

**FROM:** Akiva Abramovitch, Ph. D.  
Product Chemistry Team Leader  
Technical Review Branch/RD (7505P)

*J* *SBW 10-24-12*

**TO:** Michael Walsh/ Kathryn Montague, RM 23  
Herbicide Branch / RD (7505P)

**Company Name:** Dow AgroSciences  
**Formulation Type:** Liquid (Herbicide)

**INTRODUCTION:**

Issues raised concerning the potential presence of toxic impurities in the 2,4 D Choline salt and its source since it is one of the active ingredients of this product. The toxic impurities are discussed in the Confidential Appendix.

The registrant has submitted an application for the registration of the new end use product and the product chemistry data and the CSF is being evaluated.

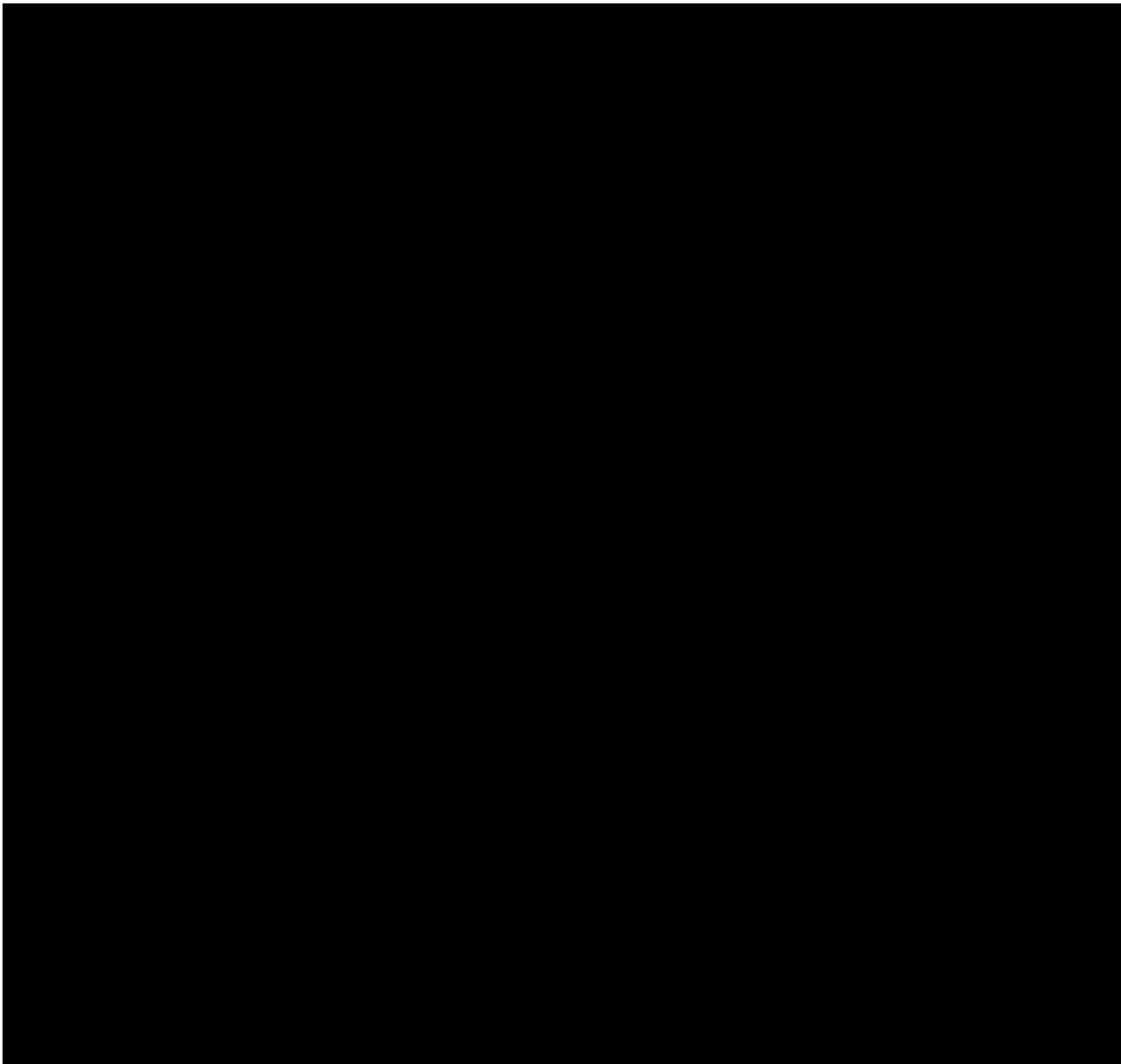
**CONCLUSIONS:**

The TRB has reviewed the product chemistry data cited for the proposed end-use product and has concluded that:

1. The most toxic 2,3,7,8-tetrachloro isomers of the dibenzodioxin and dibenzofuran and other chlorinated isomers of lower toxicity were not detected in the registered sources of the active ingredients for the basic and alternate formulations of this product.
2. The final approval for the pending basic and alternate CSFs of this product is pending the evaluation and acceptance of the Group A data and the referenced Group B data as instructed in DP# 396760 Decision 457755.

DP BARCODE No.: 405955; FILE SYMBOL No.: 62719-AUO ; PRODUCT NAME: GF-2726;  
DECISION No.: 457955; PC Code(s): 051505 & 103608; ACTION CODE: R311; FOOD Use: Yes

Confidential Appendix:





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 5 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. Diego Fonseca  
Regulatory Leader – Regulatory Affairs  
Dow AgroSciences, LLC  
9330 Zionsville Road  
Indianapolis, IN 46268-1054

Subject: Information Requested by the Agency for Assessment of 2,4-D AAD-1 Enlist Corn  
Active Ingredients: 2,4-D Choline Salt and 2,4-D Choline Salt + Glyphosate  
62719-AGO; Decision 442244  
62719-AUO; Decision 457755  
62719-640; Decision 456480

Dear Mr. Fonseca:

The Office of Pesticide Programs has previously requested additional information to complete our review of the proposed use of 2,4-D choline salt on herbicide-tolerant corn. Most, if not all, of the information listed below should look familiar to you, as the necessity of these items have been discussed with you during various meetings and conference calls regarding these actions.

Since the requested information has not yet been received by the EPA, this letter confirms the information that the Agency considers outstanding to support the review of the applications referenced above. Information requested by the Office of Pesticide Programs from Dow AgroSciences for the 2,4-D choline salt corn actions includes:

- 1) An endangered species assessment that focuses on the area intended for the first year of use with Enlist corn seed and is in compliance with EPA's "Overview of the Ecological Risk Assessment Process in the Office of Pesticide Programs, U.S. Environmental Protection Agency: Endangered and Threatened Species Effects Determinations" dated January 23, 2004
- 2) Identity of specific counties planned by Dow for the first year of use with Enlist corn seed and coordinating acreage information
- 3) Typical end-use product data addressing phytotoxicity to plants since some of the formulations are mixed with glyphosate (seedling emergence and vegetative vigor studies on the formulated product)
- 4) Full and complete storage stability data for 2,4-DCP use on corn - only interim data has been provided
- 5) Product use guide
- 6) Technology use agreement



Page 2 of 2  
Previously Requested Data and Information  
Pending 2,4-D Choline Salt Corn Actions  
62719-AGO, 62719-AUO, & 62719-640

Though not previously discussed, the Health Effects Division is also requesting the *J. F. Culligan, Magnitude of the Residue of 2,4-D in/on Herbicide Tolerant Field Corn Containing the Aryloxyalkanoate Dioxygenase-1 (AAD-1) Gene – Formulation Bridging Study. Protocol 101620, Internal Report of Dow AgroSciences, LLC* study referenced in the interim Storage Stability data for 2,4-DCP use on corn as a study in progress.

Timely receipt of this information is critical to allow continued progress with the review of the above applications. Further delay in the submission of the identified information is likely to result in corresponding delays in any regulatory decisions regarding these applications. Therefore, please advise us as to your schedule for submitting the previously requested information and data cited on page 1 of this letter. Should you have any questions regarding this letter, please feel free to contact me directly via telephone at (703) 305-7546 or via email at [kenny.dan@epa.gov](mailto:kenny.dan@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'DKenny', with a long horizontal flourish extending to the right.

Daniel Kenny, Chief  
Herbicide Branch  
Registration Division  
Office of Pesticide Programs



62719 - AVO  
New EUP request from Dow - combo product on AAD-12 cotton and soybeans  
Kathryn Montague to: Michael Walsh, Dan Kenny 11/09/2012 09:30 AM

From: Kathryn Montague/DC/USEPA/US  
To: Michael Walsh/DC/USEPA/US@EPA, Dan Kenny/DC/USEPA/US@EPA

Hello,

Just a heads-up that we've gotten a new EUP request in to use 62719-AVO (the 2,4-D choline/glyphosate combo product) on AAD-12 soy and cotton. The product also has that inert that IAB is still clearing, although their due date is early December.

Dan - not sure if we want/need to mention this in the 2-pager you're working on today.

Mike - the jacket is being transferred to you.

Thanks,  
Kay

Kathryn V. Montague  
Product Manager 23  
OPPTS/OPP/RD/HB  
1200 Pennsylvania Ave., NW  
Mailcode 7505P  
Washington, DC 20460  
Phone: (703)305-1243



Re: 2,4-D. Revised label for DP 405028. Fw: 2,4-D. Dow corrected revised label. Fw: Problems with revised label. Re: EPA Reg. No. 62719-AUO Label replacement

Sujatha Sankula to: Michael Walsh

10/02/2012 09:14 AM

From: Sujatha Sankula/DC/USEPA/US  
To: Michael Walsh/DC/USEPA/US@EPA

Mike

No new bean is needed. Thank you.

Sujatha

Sujatha Sankula, Ph.D.  
Lead Biologist  
Environmental Risk Branch I  
Environmental Fate and Effects Division (7507P)  
Office of Pesticide Programs  
US Environmental Protection Agency  
2777 S. Crystal Drive  
Arlington, VA 22202  
Tel: 703-305-2148  
Fax: 703-305-6309  
sankula.sujatha@epa.gov

Michael Walsh

Hi Sujatha. Based on a recent HED inquiry regar...

09/28/2012 10:59:13 AM

From: Michael Walsh/DC/USEPA/US  
To: Sujatha Sankula/DC/USEPA/US@EPA  
Date: 09/28/2012 10:59 AM  
Subject: 2,4-D. Revised label for DP 405028. Fw: 2,4-D. Dow corrected revised label. Fw: Problems with revised label. Re: EPA Reg. No. 62719-AUO Label replacement

[attachment "GF-2726-XXX 31Aug12d W-Ed.pdf" deleted by Sujatha Sankula/DC/USEPA/US]  
[attachment "GF-2726-XXX 31Aug12d.pdf" deleted by Sujatha Sankula/DC/USEPA/US]

Hi Sujatha.

Based on a recent HED inquiry regarding the revised product label and formulation for 62719-AUO, the registrant has provided a corrected label and an explanation regarding the formulations for GF-2726 (62719-AUO) and GF-2727 (62719-640).

Please let me know if you want another bean sent up with this correct label, or you are willing to just swap out the bad label for this corrected version for DP 405028.

Thank you for your consideration.

-Mike

Mike thanks. See below the response to your e-mail.

1. Please see attached a corrected copy of GF-2726 label (EPA No.

62719-AUO). First attachment is a copy of GF-2726 label with visible edits. Second attachment is the new clean copy of GF-2726 label.

2. The explanation for second point in your e-mail below is as follows. In fact GF-2726 and GF-2727 (EPA No. 62719-640) are very similar products with same content of both active ingredients (2,4-D Choline 24.4%; Glyphosate DMA 22.1%). The difference between these two compounds is driven by the surfactant composition: GF-2726 contains [REDACTED], whereas GF-2727 doesn't. [REDACTED]

[REDACTED] Also as complementary information, GF-2726 is intended to be the lead formulation in the market, whereas GF-2727 will remain as the backup product.

----- Message from William Cutchin <Cutchin.William@epamail.epa.gov> on Tue, 22 May 2012 18:48:07 +0000 -----

To: "Fonseca, Diego (D)" <dfonseca@dow.com>

John Redden <Redden.John@epamail.epa.gov>, Pv Shah  
cc: <Shah.Pv@epamail.epa.gov>

Subject: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

If you have any further questions, please don't hesitate to ask.

William D. Cutchin, Chemist  
Inert Ingredient Assessment Branch  
Environmental Protection Agency  
PY-S7828  
703-305-7990





2,4-D. Dow corrected revised label. Fw: Problems with revised label. Re: EPA  
Reg. No. 62719-AUO Label replacement  
Michael Walsh to: Alexandra LaMay

09/28/2012 10:47 AM

From: Michael Walsh/DC/USEPA/US  
To: Alexandra LaMay/DC/USEPA/US@EPA



GF-2726-XXX 31Aug12d W-Ed.pdf GF-2726-XXX 31Aug12d.pdf

Hi Alexandra.

Based on your inquiry, the registrant has provided a corrected label. Please see attached file.

Dow has also provided an explanation regarding the formulations for GF-2726 (62719-AUO) and GF-2727 (62719-640).

Please let me know if you want another bean sent up with this correct label, or you are willing to just swop out the bad label for this corrected label for DP 405027.

Thank you for your consideration.

-Mike

Mike thanks. See below the response to your e-mail.

1. Please see attached a corrected copy of GF-2726 label (EPA No. 62719-AUO). First attachment is a copy of GF-2726 label with visible edits. Second attachment is the new clean copy of GF-2726 label.

2. The explanation for second point in your e-mail below is as follows. In fact GF-2726 and GF-2727 (EPA No. 62719-640) are very similar products with same content of both active ingredients (2,4-D Choline 24.4%; Glyphosate DMA 22.1%). The difference between these two compounds is driven by the surfactant composition: GF-2726 contains [REDACTED], whereas GF-2727 doesn't. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] Also as complementary information, GF-2726 is intended to be the lead formulation in the market, whereas GF-2727 will remain as the backup product.

----- Message from William Cutchin <Cutchin.William@epamail.epa.gov> on Tue, 22 May 2012 18:48:07 +0000 -----

To: "Fonseca, Diego (D)" <dfonseca@dow.com>

John Redden <Redden.John@epamail.epa.gov>, Pv Shah



cc: <Shah.Pv@epamail.epa.gov>

Subject: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

If you have any further questions, please don't hesitate to ask.

William D. Cutchin, Chemist  
Inert Ingredient Assessment Branch  
Environmental Protection Agency  
PY-S7828  
703-305-7990



2,4-D. Revised label for DP 405028. Fw: 2,4-D. Dow corrected revised label.  
Fw: Problems with revised label. Re: EPA Reg. No. 62719-AUO Label  
replacement

Michael Walsh to: Sujatha Sankula

09/28/2012 10:59 AM

From: Michael Walsh/DC/USEPA/US  
To: Sujatha Sankula/DC/USEPA/US@EPA



GF-2726-XXX 31Aug12d W-Ed.pdf GF-2726-XXX 31Aug12d.pdf

Hi Sujatha.

Based on a recent HED inquiry regarding the revised product label and formulation for 62719-AUO, the registrant has provided a corrected label and an explanation regarding the formulations for GF-2726 (62719-AUO) and GF-2727 (62719-640).

Please let me know if you want another bean sent up with this correct label, or you are willing to just swap out the bad label for this corrected version for DP 405028.

Thank you for your consideration.

-Mike

Mike thanks. See below the response to your e-mail.

1. Please see attached a corrected copy of GF-2726 label (EPA No. 62719-AUO). First attachment is a copy of GF-2726 label with visible edits. Second attachment is the new clean copy of GF-2726 label.

2. The explanation for second point in your e-mail below is as follows. In fact GF-2726 and GF-2727 (EPA No. 62719-640) are very similar products with same content of both active ingredients (2,4-D Choline 24.4%; Glyphosate DMA 22.1%). The difference between these two compounds is driven by the surfactant composition: GF-2726 contains [REDACTED], whereas GF-2727 doesn't. [REDACTED]

[REDACTED] Also as complementary information, GF-2726 is intended to be the lead formulation in the market, whereas GF-2727 will remain as the backup product.

----- Message from William Cutchin <Cutchin.William@epamail.epa.gov> on Tue, 22 May 2012 18:48:07 +0000 -----

To: "Fonseca, Diego (D)" <dfonseca@dow.com>

John Redden <Redden.John@epamail.epa.gov>, Pv Shah

cc: <Shah.Pv@epamail.epa.gov>

Subject: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

If you have any further questions, please don't hesitate to ask.

William D. Cutchin, Chemist  
Inert Ingredient Assessment Branch  
Environmental Protection Agency  
PY-S7828  
703-305-7990



EPA Reg. No. 62719-AUO Label replacement  
 Fonseca, Diego (D)  
 to:  
 Michael Walsh  
 09/04/2012 08:57 AM  
 Hide Details  
 From: "Fonseca, Diego (D)" <dfonseca@dow.com>

To: Michael Walsh/DC/USEPA/US@EPA

3 Attachments



image001.gif GF-2726-XXX 31Aug12d W-Ed.pdf GF-2726-XXX 31Aug12d.pdf



Mike, this e-mail contains two attachments as follows:

- GF-2726-XXX31Aug12d W-Ed.pdf (86KB): Original GF-2726 Label submitted Dec 2011, with tracked (visible) edits being proposed;
- GF-2726-XXX31Aug12d.pdf (86KB): New clean copy, with proposed changes fully edited.

Mike, we are interested to replace current proposed label under review for 62719-AUO with a new clean corrected version that includes some changes. I personally think are minor changes as you will be able to see in the attachments. So, I wonder if is not too late, considering the sore of changes being proposed. Anyway, I'll appreciate your thoughts on this regard.

**Diego Fonseca**

Regulatory

Office: 317 337-4693

Fax: 317 337-4649

dfonseca@dow.com



**From:** Michael Walsh [<mailto:Walsh.Michael@epamail.epa.gov>]  
**Sent:** Monday, May 21, 2012 6:41 AM  
**To:** Fonseca, Diego (D)  
**Subject:** RE: What type of revisions are you seeking to make?

I will check into this, but when will you have an idea of what types of revisions are being proposed?

▼ "Fonseca, Diego (D)" ---05/17/2012 03:47:45 PM---As far as I understand they are not significant, but haven't seen them yet. I just wanted to check w

From: "Fonseca, Diego (D)" <[dfonseca@dow.com](mailto:dfonseca@dow.com)>  
 To: Michael Walsh/DC/USEPA/US@EPA  
 Date: 05/17/2012 03:47 PM  
 Subject: RE: What type of revisions are you seeking to make?

---

As far as I understand they are not significant, but haven't seen them yet. I just wanted to check with you for the flexibility or no to accept a label replacement for -AUO, of course under the assumption that those changes won't be significant. If there is some flexibility, what is the latest timing to do it, taking as a reference the current PRIA time of Dec 2012. Thanks,

**Diego Fonseca**  
 Regulatory  
 Office: 317 337-4693  
 Fax: 317 337-4649  
[dfonseca@dow.com](mailto:dfonseca@dow.com)

**From:** Michael Walsh [<mailto:Walsh.Michael@epamail.epa.gov>]  
**Sent:** Thursday, May 17, 2012 2:19 PM  
**To:** Fonseca, Diego (D)  
**Subject:** What type of revisions are you seeking to make?

Hi Diego.

What type of revisions to the -AUO label are you proposing to make? Are they significant? Why are they being proposed now?

Please let me know.

Thanks.

-Mike





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUO DECISION NO.: 457755  
PC Code(s): 051505,103608 ACTION CODE: R311  
FOOD Use: Yes

DATE OUT: August 15, 2012

SUBJECT: End Use Product Chemistry Review  
Product Name: GF-2726

FROM: Hari Mukhoty  
Product Chemistry Team  
Technical Review Branch / Registration Division (7505P)

TO: Michael Walsh, CRM / Kathryn Montague PM - 23  
Herbicide Branch / Registration Division (7505P)

Company Name: Dow AgroSciences LLC  
Formulation Type: Not provided.

**INTRODUCTION:**

The registrant has submitted one basic CSF (Dated: 09/28/2011), one amended CSF (dated: 11/28/2011) to the aforesaid basic as alternate formulation (Alt. # 1) and proposed a product specific label for the registration of the aforesaid product under EPA File Symbol No. 62719-AUO. The registrant submitted product chemistry Group A and Group B data under MRID(s): 486441-01 and 482898-02.

The applicant has requested the registration of the proposed product under PRIA 311 requirements.

TRB has been requested to evaluate the product chemistry data required for registration of the proposed product.

**SUMMARY OF FINDINGS:**

1. Name of Active Ingredient(s): Glyphosate DMA Salt (22.1%) and 2,4-Dichlorophenoxyacetic acid choline salt (24.4%).
2. Has the registrant claimed substantial similarity to registered product?  
☐ Yes ☒ No ☐ NA If yes: EPA Reg. No.
3. The source material(s) of the active ingredient(s) is/are registered with the Agency.
4. All inert ingredients, except one, are approved for food uses.
5. The CSFs of the proposed basic and alternate formulation has been filled out completely but may not be considered correctly until [REDACTED]

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUO DECISION NO.: 457755  
PC Code(s): 051505,103608 ACTION CODE: R311  
FOOD Use: Yes

6. Confidential Statement of Formula(s):

[X] Basic - Dated: 09/12/2011 re-submitted - Dated: NA  
[X ] Alternate Dated: 11/28/2011 re-submitted: Dated: NA

Alternate CSF(s) complies with 40CFR §152.43: [ X ] Yes [ ] No NA [ ]. Alternate CSF is not acceptable for other changes needed to become acceptable.

7. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concur with product label (PR Notice 91-2)  
[ X ] Yes

Is the sub statement in compliance with PR Notice 97-6?

[ X ] Yes [ ] No - Uses the term "Other Ingredients"  
, if not, explain below:

Metallic equivalent: [ ] Yes [ X ] NA;  
Soluble arsenic: [ ] Yes [ X ] NA  
Isomeric ratios: [ ] Yes [ X ] NA  
Acid equivalent: [ ] Yes [ X ] NA

b. Health related sub statements:

Petroleum distillate at > 10%: [ ] Yes [ ] No [ X ] NA  
Methanol at > 4%: [ ] Yes [ ] No [ X ] NA  
Sodium Nitrate / Sodium Nitrite [ ] Yes [ ] No [ X ] NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

[X ] Yes [ ] No Proposed label contains a statement for type of liner required to prevent combustible gas mixture.

Total Release Fogger PR Notice 98-6 (40 CFR 156.78 d): [ ] Yes [ ] No [X ] NA

d. Label requires an additional Storage and Disposal statement: [ X ] Yes [ ] No

Final decision of overall label acceptance will be made by the PM.

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUO DECISION NO.: 457755  
 PC Code(s): 051505,103608 ACTION CODE: R311  
 FOOD Use: Yes

8. Group A: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos. 486441-01
			Yes	No		
830.1550	Product Identity & Composition		X		A	"
830.1600	Description of materials used to produce the product		X		A	"
830.1650	Description of formulation process		X		A	"
830.1670	Discussion on the formation of impurities		X		A	"
830.1700	Preliminary analysis			X	NA	"
830.1750	Certified limits (158.350)	Standard certified Limits	X		A	
		Justification for wider limits				
830.1800	Enforcement analytical method #		X		A	"

A = Acceptance, NA = Not Acceptable, G = Data Gap,  
 W = Waiver Request, I = In Progress, NA = Not Applicable  
 # Analytical Method: Liquid Chromatographic method. Validation was performed for accuracy, precision and linearity.

DP BAR CODE NO.: 396760 EPA FILE SYMBOL NO.: 62719-AUO DECISION NO.: 457755  
PC Code(s): 051505,103608 ACTION CODE: R311  
FOOD Use: Yes

9. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos. 482898-02
830.6303	Physical State	Liquid	A	"
830.6315	Flammability	> 212 ° F / > 100° C	A	"
830.6316	Explosibility	Not potentially explosive	A	"
830.7000	pH	6.17	A	"
830.7300	Density	1.1676 g/mL	A	"

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request,  
NA = Not applicable, I = In progress.

**CONCLUSIONS:**

1. TRB has reviewed the CSFs (dated: 09/12/2011 & 11/28/2011) for the proposed basic and alternate formulation. The acceptability of the CSFs shall be determined following the outcome of IIAB's approval of one inert ingredient used in the formulation. This is because the applicant has requested the registration under PRIA 2 R311 conditions. The CSFs will be is attached with this review and could be located in OPPIN CHEM DOCS.
2. Product chemistry Group A and Group B data, with the exception of one year storage stability (830.6317) and corrosion characteristics (830.6320) data are satisfied and acceptable.
3. The registrant must generate one year storage stability (830.6317) and corrosion characteristics (830.6320) data on the proposed product. It is required that the observations be made at 0, 3, 6, 9, and 12 month intervals. The results must be submitted to the Agency in electronic and hard copy format.
4. The proposed label was screened as it pertains to the product chemistry requirements. The proposed label contains a Physical or Chemical hazards statement. The PM should request for Formulation Type information from the registrant. The final review of the proposed label and uses are the purview of the PM team.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

15/AUG/2012

MEMORANDUM: Acute Toxicity Review for GF-2726

Subject: Name of Pesticide Product: GF-2726  
EPA File Symbol: 62719-AUO  
DP Barcode: D396761  
PC Codes: 103608 Glycine, N-(phosphonomethyl)-, compd.  
with N-methylmethanamine (1:1)  
051505 Ethanaminium, 2-hydroxy-N,N,N-trimethyl-,  
2-(2,4-dichlorophenoxy)acetate (1:1)

From: Tracy Keigwin, Biologist  
Technical Review Branch  
Registration Division (7505P)

To: Michael Walsh, RM 23  
Herbicides Branch  
Registration Division (7505P)

Applicant: Dow AgroSciences, LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

*May 2012 Keigwin*  
*Michael Walsh*  
*Team Leader Toxicology*

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Glyphosate: N-(phosphonomethyl)glycine, dimethylammonium salt	22.1
2,4-Dichlorophenoxyacetic acid, choline salt	24.4
<u>Other Ingredient(s):</u>	<u>53.5</u>

Total: 100.0%



**ACTION REQUESTED:** The Risk Manager requests: "Please review all of the attached information for new product registration 62719-AUO. Please note that this action included review of an inert [REDACTED] which is being reviewed by the inerts group (PV Shah). The unapproved inert is included in the product formulation. Your review of the data can be conditional upon the approval of the inert..."

**BACKGROUND:** Dow AgroSciences, LLC has cited acute toxicity data (MRIDs 48289803-48289808) to support the registration of GF-2726, EPA File Symbol 62719-AUO. The test substance that was used in the cited studies was GF-2726 (the proposed product). The registrant has additionally submitted [REDACTED] (a dermal sensitization study) for review. Note that the test substance used in [REDACTED] was not the subject product. The details and results of this study are in the Confidential Appendix at the end of this review. **This Confidential Appendix should be considered CBI.**

A search of the OPP electronic files shows that the cited acute toxicity studies (MRIDs 48289803-48289808) were previously reviewed and classified as acceptable (McAndrew; 08/JUN/2011).

**RECOMMENDATIONS:**

1. The cited studies are acceptable to support registration of EPA File Symbol 62719-AUO. The acute toxicity profile of GF-2726, EPA File Symbol 62719-AUO is as follows:

acute oral toxicity	III	acceptable	MRID 48289803
acute dermal toxicity	IV	acceptable	MRID 48289804
acute inhalation toxicity	IV	acceptable	MRID 48289805
primary eye irritation	II	acceptable	MRID 48289806
primary skin irritation	IV	acceptable	MRID 48289807
dermal sensitization	Sensitizer	acceptable	MRID 48289808

2. Acceptance of this action is contingent upon the approval of the proposed basic and alternate CSF, and the approval of [REDACTED].

3) This product does meet the criteria for a Restricted Use pesticide based on the Category II rating for primary eye irritation and the potential for residential application (see page 7 "Non-Agricultural Use Requirements" box on the product label). It is up to the RM whether this is necessary or if mitigating with PPE is sufficient.

\*Inert ingredient information may be entitled to confidential treatment\*

**PRODUCT ID #:** 62719-649

**PRODUCT NAME:** GF-2726

### **PRECAUTIONARY STATEMENTS**

**SIGNAL WORD:** WARNING

**SPANISH SIGNAL WORD:** AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand the label, find someone to explain it to you in detail.)

#### **Hazards to Humans and Domestic Animals:**

Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear: Long-sleeved shirt and long pants, Socks, Shoes, and chemical-resistant gloves (such as Natural Rubber, Selection Category A).

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

#### **First Aid:**

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

## **CONFIDENTIAL APPENDIX**

**Reviewer:** Tracy Keigwin  
**Risk Manager (EPA):** 01

**Date:** August 15, 2012

The following table is the Acute Toxicity Data Evaluation Record (DER) for [REDACTED]. This is an LLNA study submitted in support of the proposed product, File Symbol 62719-AUO. This study assesses the sensitization potential of 2 inert ingredients in the subject product [REDACTED]. This information should be considered CBI:

<b>1. DP BARCODE:</b> 396761				
<b>2. PC CODES:</b> 051505 and 103608				
<b>3. CURRENT DATE:</b> August 15, 2012				
<b>4. TEST MATERIAL:</b> [REDACTED]				
Study/Species/Lab Study # /Date	MRID	Results	Tox Cat	Core Grade
[REDACTED]			Pos	A
		No sign of erythema was observed at any treatment site during the study, nor was body weight affected. SI value for positive control (30% HCA in 1% L92) was 3.8 in treated mice.		

**Core Grade Key:** A =Acceptable, S = Supplementary, U = Unacceptable, D = Data Gap

62719-640

6/13/2012

1 of 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

Mr. John Jachetta  
Dow Agro Sciences  
9330 Zionsville Rd.  
Indianapolis, IN 46268-1054

JUN 13 2012

Subject: Supplemental Label for Use of AAD-12 Soybeans for Research, Field Trials, and  
Seed Production  
EPA Reg. No.: 62719-640  
GF-2727

Dear Mr. Jachetta,

The Agency has received your application for an amendment, dated May 31, 2012. The label described above, submitted under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the accepted label is enclosed for your records. If you have any questions, please contact Kathryn Montague (703-305-1243 or [montague.kathryn@epa.gov](mailto:montague.kathryn@epa.gov) ).

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague".

Kathryn V. Montague  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)



# Supplemental Labeling



Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

## GF-2727

EPA Reg. No. 62719-640

**For use only on 2,4-D and glyphosate-tolerant soybeans containing AAD12 expressing events grown for research, field trials, and seed production, including USDA regulated plantings or seed production**

### ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling, as well as the GF-2727 container labeling, must be in the possession of the user at the time of application.
- Read the label affixed to the container for GF-2727 before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of GF-2727 according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for GF-2727.

**This supplemental label expires on June 15, 2015, and must not be used or distributed after this date.**

### Directions for Use

Refer to product label for GF-2727 for General Use Precautions, Restrictions and Application Instructions

This product is only for the control of labeled weeds and non-2,4-D/glyphosate tolerant soybean plants in research, field trials, and seed production, including USDA regulated plantings, or seed production fields of soybean containing AAD12 expressing events plus a glyphosate-tolerant trait. Injury or destruction of the soybeans will occur if soybeans not designated as 2,4-D/glyphosate-tolerant are treated with this product. 2,4-D-tolerant AAD12 soybean contains patented technology licensed exclusively to Dow AgroSciences. Planting of 2,4-D-tolerant soybean containing AAD12 expressing events may only be done under agreement with and following all instructions of Dow AgroSciences.

Apply up to 4.75 pints of this product in a spray volume of 5 gallons or more per acre for ground equipment. A second application, with a minimum of 12 days between applications, at up to 4.75 pints per acre may be applied, if needed to control weeds or non-2,4-D and glyphosate tolerant soybean plants.

Avoid off-target movement to avoid injury to desirable plants. Refer to the GF-2727 main label for information regarding application recommendations and restrictions.

**Application Timing:** GF-2727 may be applied to 2,4-D/glyphosate-tolerant soybean preplant, preemergence and postemergence up to R2 (full flowering stage).

### Restrictions:

- **Maximum Seasonal Use Rate:** Do not exceed a maximum rate of 9.5 pints of GF-2727 per acre per crop season.
- **Do not use soybean plants containing AAD12 expressing events for fodder or hay.** Harvested seed of treated soybean containing AAD12 expressing events cannot be used or processed for food or feed. Soybean plants must be destroyed post-harvest

**Note:** This product is toxic to fish and aquatic invertebrates. Refer to the Environmental Hazards section of the product label attached to the product container for required protective measures.

®Trademark of Dow AgroSciences LLC

Rxxx-001

EPA accepted: \_\_/\_\_/\_\_

Initial printing.

308/2E  
May 12, 2012



Document Processing Desk (DATA)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
APPLICATION FOR NEW REGISTRATION - SECTION 3

Dow AgroSciences is respectfully submitting the field spray drift study for product GF-2726 in support of our petition for registration, which is currently under the EPA's review.

**Contents of Submission**

Volume No.	Administrative Contents
Volume 1	<ul style="list-style-type: none"><li>Transmittal document (this letter)</li><li>EPA Form 8570-1, Application for Pesticide</li></ul>

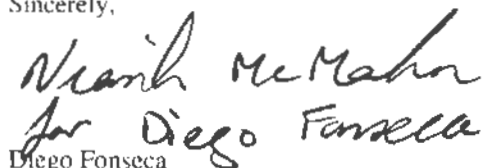
Volume Number	MRID No.	Contents
Volume #2 N/A	<b>48844001</b>	Title: Field Spray Drift Determinations with GF-2726 and 2,4-D/Glyphosate Tank Mixes Author: P.K. Havens; D.E. Hillger; A.J. Hewett; G.R. Kruger Study ID: 120576 Pages: 1-275 Report Date: May 12, 2012 (1 Copy)

KATHRYN MONTAGUE/PM-23  
GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-AUO  
APPLICATION FOR NEW REGISTRATION - SECTION 3  
COMPLIMENTARY DATA  
May 18, 2012

Page 2

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Stacy Frank, Regulatory Specialist at 317-337-5635 (slfrank@dow.com).

Sincerely,

Handwritten signature of Diego Fonseca.

Diego Fonseca  
Regulatory Leader - Regulatory Affairs  
317-337-4693  
317-337-4649 (FAX)  
dfonseca@dow.com

Enclosures

DF/kh



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-AUO	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/GF-2726	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This action is for a complimentary copy of the field spray drift study for product GF-2726 in support of our petition for registration which is currently under the EPA's review.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Diego Fonseca	Title Regulatory Leader	Telephone No. (Include Area Code) (317)337-4693
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Diego Fonseca</i>	3. Title Regulatory Leader	
4. Typed Name Diego Fonseca (dfonseca@dow.com)	5. Date May 18, 2012	



Receipt date  
changed to

5/30/12

FORWARDED BY USDA  
COMMENT IN SUPPORT OF ACTIONS



**Fw: Dow AgroScience Enlist - Weed Control System - Do You Know Who May Be Working On This?**

**Kathryn Montague** to: Michael Walsh, Dan Kenny

03/29/2012 02:58 PM

FYI....

Kathryn V. Montague  
Product Manager 23  
OSCPP/OPP/RD/HB  
1200 Pennsylvania Ave., NW  
Mailcode 7505P  
Washington, DC 20460  
Phone: (703)305-1243

— Forwarded by Kathryn Montague/DC/USEPA/US on 03/29/2012 02:58 PM —

From: Mike Mendelsohn/DC/USEPA/US  
To: Nicole Berckes/DC/USEPA/US@EPA, Kathryn Montague/DC/USEPA/US@EPA  
Cc: Josh Alexander/DC/USEPA/US@EPA  
Date: 03/29/2012 01:40 PM  
Subject: Fw: Dow AgroScience Enlist - Weed Control System - Do You Know Who May Be Working On This?

Nicole and Kay,

This is a comment in favor of RD granting pending 2,4-D actions. My understanding is that it should be forwarded to RD in relation to the pending actions. Thanks.

Mike Mendelsohn  
Senior Regulatory Specialist  
Office of Pesticide Programs/ Biopesticides and Pollution  
Prevention Division (7511P)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington DC 20460  
(703) 308-8715  
(703) 463-7302 Blackberry  
(703) 308-7026 (fax)  
<http://www.epa.gov/pesticides/biopesticides>

— Forwarded by Mike Mendelsohn/DC/USEPA/US on 03/29/2012 01:38 PM —

From: Nicole Berckes/DC/USEPA/US  
To: Mike Mendelsohn/DC/USEPA/US@EPA  
Date: 03/29/2012 01:31 PM  
Subject: Fw: Dow AgroScience Enlist - Weed Control System - Do You Know Who May Be Working On This?

Mike, are you working on this product (or, do you know who might be)? Many thanks!

Nicole

Nicole Berckes  
Communications and Registration Liason  
U.S. Environmental Protection Agency  
Biopesticides and Pollution Prevention Division





United States Department of Agriculture

Office of the Secretary  
Washington, D.C. 20250

March 13, 2012

Mr. Eric E. Wachter  
Director  
Office of the Executive Secretariat  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Mr. Wachter:

The U.S. Department of Agriculture has received the enclosed letter.

However, we believe the issue in this letter is within the jurisdiction of the Environmental Protection Agency. Accordingly, we have taken the liberty of forwarding this letter to you for such action as you deem appropriate.

If you have any questions, please feel free to contact me by telephone at (202) 720-7100.

Thank you for your assistance.

Sincerely,

Paula Ross-DeFlanders  
Correspondence Analyst  
Office of the Executive Secretariat

Enclosure

REC  
2012 MAR 21 PM 12:55  
OFFICE OF THE  
EXECUTIVE SECRETARIAT



tmpFEC[1]  
From: Mike Ver Steeg [prestige@alliancecom.net]  
Sent: Monday, March 05, 2012 4:46 PM  
To: AGSEC - OES  
Subject: Enlist with Colex-D comments  
Attachments: Enlist Weed Control System.pdf

Secretary Vilsack,

Please review the attachment concerning Enlist with Colex-D technology from DOW AgriSciences.

Thank you,

Mike Ver Steeg  
Prestige Pork, Inc  
1817 250th Street  
Inwood, IA 51240  
712-541-0199 cell



To Whom it may concern:

I am Mike Ver Steeg, owner and operator of Prestige Pork Inc. Prestige Pork operates 800 acres of corn and soybean production in Northwest Iowa. I also help with the management of another 800 acres of corn and soybean production. I have a minor in agronomy from Iowa State University, grew up on a farm and have been actively farming for 17 years.

On our farm we use no-till methods in crop production and weed management is a critical part of our farming operation. Over the years we have noticed more hard to kill weeds and have had to change our weed management strategies. I believe it is very important to continue to seek out new technologies to combat weeds in crop production. That is why I feel the Enlist Weed Control System with Colex-D Technology would be beneficial to the success of my farming operation.

I have noticed how we need to use increased amounts of glyphosate and tank mix other products with our glyphosate to kill weeds. The combination of pre-emergence herbicides with a product like Enlist, with multiple modes of action, will ensure the effectiveness of weed control into the future.

I have also been able to witness drift, volatilization and efficacy studies of the Enlist product. I can honestly say I was impressed with the reduction in drift and volatilization. Enlist also shows great crop safety and kills weeds effectively.

I constantly strive to be a good steward on my farm, and I believe the Enlist Weed Control System would help me be a better steward. I hope that you will approve the use of the Enlist Weed Control System.

Mike Ver Steeg

1817 250<sup>th</sup> Street

Inwood, IA 51240

United States Department of Agriculture  
Washington, D.C. 20250 - 3301



Official Business

BLACK HISTORY MONTH

FIRST CLASS



US OFFICIAL MAIL  
1st Class  
Per 5-400-100

POSTAGE  
\$01.10  
C7141201  
Marked Payment  
US POSTAGE

Mr. Eric E. Wachter  
Director  
Office of the Executive Secretariat  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

1105A  
CBS





**FW: Pending actions. Claiming confidentiality.**  
**Fonseca, Diego (D)** to: Michael Walsh

02/27/2012 10:15 AM

History: This message has been replied to and forwarded.

Thanks Mike. With regard to your question on first e-mail below, Dow AgroSciences claims confidentiality for actions listed below on CBI documents only, such as: CSF, data and data citations. Confidentiality is not being claimed on any other aspects. These actions currently under EPA review are:

62719-AGO: Product Registration of GF-2654 TC;  
62719-AUU: Product Registration of GF-2654 TS;  
62719-AUO: Product Registration of GF-2726;  
62719-640: Label Amendment

If EPA OPP is considering a possible public process and publication of Notices of Receipt for these applications, DAS is truly interested and will appreciate to know as soon as possible the Agency's plans on this regard.

Sincerely,

Diego Fonseca  
Regulatory  
Office: 317 337-4693  
Fax: 317 337-4649  
dfonseca@dow.com

-----Original Message-----

From: Michael Walsh [mailto:Walsh.Michael@epamail.epa.gov]  
Sent: Saturday, February 25, 2012 9:11 AM  
To: Fonseca, Diego (D)  
Cc: Michael Walsh  
Subject: Fw: Pending actions. Claiming confidentiality.

Hi Diego. Thank you for your call. Please note that the confidentiality question is being asked relating to public process and possible publication of Notices of Receipt for these actions. Thanks.

-Mike

-----Forwarded by Michael Walsh/DC/USEPA/US on 02/25/2012 09:04AM -----

=====

To: "Fonseca, Diego (D)" <dfonseca@dow.com>  
From: Michael Walsh/DC/USEPA/US@EPA  
Date: 02/24/2012 09:12AM  
Subject: Pending actions. Claiming confidentiality.

=====

Dear Diego,

I recently reviewed the packages for Dow's pending AAD-12 soybeans (62719-AUU), ENLIST corn (62719-AUO), and AAD-1 corn (62719-AGO and 62719-640) actions.

Is Dow you claiming confidentiality on any aspect of these submissions, other than the confidential statements of formula, data, and data citations? I am

asking since no final decision regarding Public Process has been made.

Please let me know.

Thanks.

-Mike



62719-AVO



RE: [REDACTED]  
 Fonseca, Diego (D)  
 to:  
 William Cutchin  
 10/24/2012 08:30 AM  
 Cc:  
 Michael Walsh  
 Hide Details  
 From: "Fonseca, Diego (D)" <dfonseca@dow.com>

To: William Cutchin/DC/USEPA/US@EPA

Cc: Michael Walsh/DC/USEPA/US@EPA

History: This message has been forwarded.

4 Attachments



image001.gif image002.gif image003.png image004.jpg

Mr. Cutchin, this e-mail with the objective to know the current status of [REDACTED]

[REDACTED] I'll appreciate your response to this e-mail.

**Diego Fonseca** Regulatory Manager  
 Office: 317.337-4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
 9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



**Dow AgroSciences**

Solutions for the Growing World

**From:** William Cutchin [<mailto:Cutchin.William@epamail.epa.gov>]

**Sent:** Tuesday, May 22, 2012 2:48 PM  
**To:** Fonseca, Diego (D)  
**Cc:** John Redden; Pv Shah  
**Subject:** [REDACTED]

Mr. Fonseca,

[REDACTED]

[REDACTED]

If you have any further questions, please don't hesitate to ask.

William D. Cutchin, Chemist  
Inert Ingredient Assessment Branch  
Environmental Protection Agency  
PY-S7828  
703-305-7990

\*Inert ingredient information may be entitled to confidential treatment\*



**FW: Pending actions. Claiming confidentiality.**  
**Fonseca, Diego (D)** to: Michael Walsh

02/27/2012 10:15 AM

History:

This message has been replied to and forwarded.

Thanks Mike. With regard to your question on first e-mail below, Dow AgroSciences claims confidentiality for actions listed below on CBI documents only, such as: CSF, data and data citations. Confidentiality is not being claimed on any other aspects. These actions currently under EPA review are:

62719-AGO: Product Registration of GF-2654 TC;  
62719-AUU: Product Registration of GF-2654 TS;  
62719-AUO: Product Registration of GF-2726;  
62719-640: Label Amendment

If EPA OPP is considering a possible public process and publication of Notices of Receipt for these applications, DAS is truly interested and will appreciate to know as soon as possible the Agency's plans on this regard.

Sincerely,

Diego Fonseca  
Regulatory  
Office: 317 337-4693  
Fax: 317 337-4649  
dfonseca@dow.com

-----Original Message-----

From: Michael Walsh [mailto:Walsh.Michael@epamail.epa.gov]  
Sent: Saturday, February 25, 2012 9:11 AM  
To: Fonseca, Diego (D)  
Cc: Michael Walsh  
Subject: Fw: Pending actions. Claiming confidentiality.

Hi Diego. Thank you for your call. Please note that the confidentiality question is being asked relating to public process and possible publication of Notices of Receipt for these actions. Thanks.

-Mike

-----Forwarded by Michael Walsh/DC/USEPA/US on 02/25/2012 09:04AM -----

=====  
To: "Fonseca, Diego (D)" <dfonseca@dow.com>  
From: Michael Walsh/DC/USEPA/US@EPA  
Date: 02/24/2012 09:12AM  
Subject: Pending actions. Claiming confidentiality.  
=====

Dear Diego,

I recently reviewed the packages for Dow's pending AAD-12 soybeans (62719-AUU), ENLIST corn (62719-AUO), and AAD-1 corn (62719-AGO and 62719-640) actions.

Is Dow you claiming confidentiality on any aspect of these submissions, other than the confidential statements of formula, data, and data citations? I am

Pet Park Key, glycerate  
approved use on GMA Co

---

Beau & Metzger

asking since no final decision regarding Public Process has been made.

Please let me know.

Thanks.

-Mike



Dow 62719 -AUO



Re: Fw: GF-2726 SR (EPA file symbol 62719-ATG) 

Kathryn Montague to: Stephen Schaible

Cc: Michael Walsh

01/14/2013 09:05 AM

From: Kathryn Montague/DC/USEPA/US  
To: Stephen Schaible/DC/USEPA/US@EPA  
Cc: Michael Walsh/DC/USEPA/US@EPA

Hi, Steve,

I saw, front and center on the proposed label for GF-2726 SR, the mention of both AAD-1 corn and AAD-12 soybeans. This product cannot be registered with those references until both traits have been deregulated. The uncleared inert in the original product (-AUO) has recently been cleared, so the R311 would not be correct for the new product. It should be an R320 due to the trait crop use site, which is still not registered. We did not code the originals as R170s as the conventional uses of those crops are registered for the ai, and no tolerance revisions were needed. His options are to accept the R320, or drop the references to the GMO trait crops and call it an R310.

Drop by if you still want to discuss this.

Thanks,  
Kay

Kathryn V. Montague  
Product Manager 23  
OPPTS/OPP/RD/HB  
1200 Pennsylvania Ave., NW  
Mailcode 7505P  
Washington, DC 20460  
Phone: (703)305-1243

Stephen Schaible

Hey Kay, Diego called me this afternoon. Based...

01/11/2013 04:46:55 PM

From: Stephen Schaible/DC/USEPA/US  
To: Kathryn Montague/DC/USEPA/US@EPA  
Date: 01/11/2013 04:46 PM  
Subject: Fw: GF-2726 SR (EPA file symbol 62719-ATG)

Hey Kay,

Diego called me this afternoon. Based on your and my conversation it sounded like your stance was that this is like a new use situation. If you come in requesting a use which is currently a pending new use action, the proposed application is also a new use. You later indicated that 62719-AUO was an R320. I just checked OPPIN and it is actually an R311. This means there is also an uncleared inert? What do you think about his R310 suggestion?

Let's talk on Monday. Steve

Stephen A. Schaible, PRIA Ombudsman  
Registration Division (7505P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

ph: (703)308-9362  
fax: (703)305-6920  
fax: (703)305-6920

----- Forwarded by Stephen Schaible/DC/USEPA/US on 01/11/2013 04:42 PM -----

From: "Fonseca, Diego (D)" <dfonseca@dow.com>  
To: Kathryn Montague/DC/USEPA/US@EPA  
Cc: Stephen Schaible/DC/USEPA/US@EPA  
Date: 01/11/2013 04:23 PM  
Subject: GF-2726 SR (EPA file symbol 62719-ATG)

---

Hi Kay. I need to consult with you about an issue originated from our (DAS) application for registration of **GF-2726 SR** (See attached for your reference, an email from Teresa Downs). So please see below the information/facts on this regard.

- **GF-2726 SR** is the product that DAS wants to get registered as soon as possible. It is identical/same product as GF-2726 (EPA file symbol 62719-AUO), which is currently under EPA's review.
- Getting **GF-2726 SR** approved will allow DAS to manage better all manufacturing logistics and seed increase operations for next year planting. This action was presented/discussed with Dan Kenny in one of the EPA-DAS meetings, back in December, as a potential path, meanwhile GF-2726 (62719-AUO) obtains Federal approval. As a reference for this case, similar situation exists already for GF-2727 (62719-640). See attached approved supplemental label for seed increase and research on soybean containing AAD-12.
- The main difference between **GF-2726 SR** and GF-2726 is on the uses on their labels. GF-2726 label includes the use of Enlist Corn, whereas the **GF-2726 SR** label doesn't include the Enlist Corn use. Instead, it is driven for burndown on corn and soybean and for seed increase and field research only on corn containing AAD-1 and soybean containing AAD-12. Never for food or feed purposes.
- Given that GF-2726 (62719-AUO) and **GF-2726 SR** are identical compounds, it was my own interpretation to file this petition under code R301.
- According to my conversation with Steve, this action is definitively not under code R301 nor R170. Perhaps it should be managed under code R310, as per described by PRIA 3.

I understand the viability of this petition needs to be further discussed, either by phone/e-mail or personally, so I'm asking RD to review this case. Please contact me as soon as needed for more clarification about it. As always, I'll appreciate a

prompt response to this e-mail.

**Diego Fonseca** Regulatory Manager  
Office: 317.337 4693 [dfonseca@dow.com](mailto:dfonseca@dow.com)

**Dow AgroSciences LLC**  
9330 Zionsville Road, Indianapolis, IN 46268

[www.dowagro.com](http://www.dowagro.com)



**Dow AgroSciences**

*Solutions for the Growing  
World*

----- Message from "Downs.Teresa@epamail.epa.gov" <Downs.Teresa@epamail.epa.gov> on Thu, 10 Jan 2013 15:44:08 +0000 -----

**To:** "Fonseca, Diego (D)" <dfonseca@dow.com>

**cc:** "Yanchulis.Michael@epamail.epa.gov" <Yanchulis.Michael@epamail.epa.gov>

**Subject** Response required by 1/23/13: Proof of PRIA fee payment required for application to register GF-27: 62719-ATG)

Dear Mr. Fonseca:

The Registration Division's PRIA team has identified the above application for registration as subject to action code R170.2 (additional food use, two counts). The fee for action code R170.2 is \$119,952. As you have already paid \$1,720, the fee amount due at this time is \$118,232. Please email proof of fee payment to both [yanchulis.michael@epa.gov](mailto:yanchulis.michael@epa.gov) and me.

If you choose to withdraw this application, we will retain \$430 (25% of the fee for action code R301) and refund your remaining \$1,290 fee payment.

**If you have questions about the assignment of the above action code, please contact Steve Schaible at (703)308-9362 or [schaible.stephen@epa.gov](mailto:schaible.stephen@epa.gov).**

Sincerely,

Teresa Downs  
Information Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
phone: (703)305-5363  
fax: (703)305-7670

[www.epa.gov/pesticides](http://www.epa.gov/pesticides)[attachment "62719-640 suplabel AAD12 soy 06132012.pdf" deleted by Stephen Schaible/DC/USEPA/US]







Re: 2,4-D & glyphosate GM actions. 62719-640 and 62719-AUO. 📎

Dana Vogel to: Michael Walsh

04/11/2012 12:44 PM

Cc: Dan Kenny

From: Dana Vogel/DC/USEPA/US  
To: Michael Walsh/DC/USEPA/US@EPA  
Cc: Dan Kenny/DC/USEPA/US@EPA

History: This message has been replied to and forwarded.

Hi Mike,

I spoke with Dan Kenny awhile back on this and he indicated that there was no work to be done for the glyphosate aspect of this action. If that is still the case, RAB1 does not need anything additional.

Thanks,

Dana

\*\*\*\*\*

Dana Vogel  
Chief, Risk Assessment Branch 1  
USEPA  
Office of Pesticide Programs  
Health Effects Division  
703-305-0874

Michael Walsh

Dear Dana, The Herbicide Branch has two pendi...

04/11/2012 12:37:53 PM

From: Michael Walsh/DC/USEPA/US  
To: Dana Vogel/DC/USEPA/US@EPA  
Date: 04/11/2012 12:37 PM  
Subject: 2,4-D & glyphosate GM actions. 62719-640 and 62719-AUO.

Dear Dana,

The Herbicide Branch has two pending Dow AgroSciences actions involving 2,4-D and glyphosate product use on transgenic ENLIST AAD-1 Corn (Trait Code: DAS 40278-9). The data was beaned to Mike Metzger's Branch since they handle 2,4-D, but we want to make sure that you do not want to review the glyphosate aspect of the submission.

Please let us know.

Thank you.

-Mike  
RD/HB





**62719-AUO. Inert Review.**

**Michael Walsh** to: Fonseca, Diego (D)

07/11/2012 08:53 AM

Diego,

I spoke with the inerts Branch Chief/PV Shah.

He said their review is on track.

At this time, the review team has not identified any issues of concern.

Thanks.

-Mike

"Fonseca, Diego (D)"

Mike, action 62719-AUO, currently under EP...

07/02/2012 11:15:58 AM

From: "Fonseca, Diego (D)" <dfonseca@dow.com>  
To: Michael Walsh/DC/USEPA/US@EPA  
Date: 07/02/2012 11:15 AM  
Subject: 62719-AUO

Mike, action 62719-AUO, currently under EPA's review, [REDACTED]

[REDACTED] which is a component of the GF-2726 formulation. Perhaps you can provide to me with an update of the review status of this action at the Inerts Division Thanks,

**Diego Fonseca**

Regulatory

Office: 317 337-4693

Fax: 317 337-4649

dfonseca@dow.com



Status of [REDACTED] review for new product 62719-AUO.

Michael Walsh to: Pv Shah

Cc: Kathryn Montague

07/03/2012 07:51 AM

Dear PV,

[REDACTED]  
[REDACTED] which is a component of the GF-2726 formulation.

Dow AgroScience has asked us for an update on your Branch's review.

Please let us know the status of your review.

Thank you for your consideration.

-Mike

WAITING ON A  
RESPONSE FROM PV'S  
GROUP @  
7/3/12

Spoke w/ PV on 7/10/12 AM.  
"Things are on track" and the review  
is proceeding (as scheduled).

## Return Receipt

Your message: Status of [REDACTED] review for new product 62719-AUO.  
was received by: Pv Shah/DC/USEPA/US  
at: 07/03/2012 07:57:06 AM

\*Inert ingredient information may be entitled to confidential treatment\*



Re: 62719-AUO   
Michael Walsh to: Fonseca, Diego (D)

07/03/2012 01:29 PM

Hi Diego.

I forwarded your request for an update to the inerts group.

I will let you know when I hear back from them.

Thanks.

-Mike

"Fonseca, Diego (D)" Mike, action 62719-AUO, currently under EP... 07/02/2012 11:15:58 AM

From: "Fonseca, Diego (D)" <dfonseca@dow.com>  
To: Michael Walsh/DC/USEPA/US@EPA  
Date: 07/02/2012 11:15 AM  
Subject: 62719-AUO

Mike, action 62719-AUO, currently under EPA's review, [REDACTED]  
[REDACTED]  
[REDACTED] which is a  
component of the GF-2726 formulation. Perhaps you can provide to me with an  
update of the review status of this action at the Inerts Division. Thanks,

**Diego Fonseca**  
Regulatory  
Office: 317 337-4693  
Fax: 317 337-4649  
dfonseca@dow.com

\*Inert ingredient information may be entitled to confidential treatment\*



Re: Pesticide Products; Receipt of Applications to Register New Uses;  
Correction - OPP-2012-0012

Terri Stowe to: Jacqueline Garrett

07/10/2012 02:06 PM

Cc: Abram Primus, John-A Richards, Michael Walsh, Karen Samek,  
Rachel Holloman



THANK YOU Jackie for letting us know that "we" didn't do anything wrong (at least this time)! ;o) Hope that you all are staying cool.

Terri :o)

Terri Stowe  
(703) 305-6117 Voice, [REDACTED] AWL Cell, (703) 305-6920 Fax  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division (Mail Code 7505P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Delivery Address: 2777 Crystal Drive, 1 Potomac Yard, Mail Room S-1508, Arlington, VA 22202

The content of this e-mail message and any attachments are CONFIDENTIAL and intended solely for the addressee(s). If you are not the intended recipient, be advised that any use, dissemination, distribution, or copying of this e-mail is strictly prohibited. If you receive this message in error, please notify the sender immediately by reply e-mail and destroy the message and its attachments.

Jacqueline Garrett After reviewing the document that you sent to us...

07/10/2012 09:50:06 AM

From: Jacqueline Garrett/DC/USEPA/US  
To: Terri Stowe/DC/USEPA/US@EPA  
Cc: John-A Richards/DC/USEPA/US@EPA, Abram Primus/DC/USEPA/US@EPA  
Date: 07/10/2012 09:50 AM  
Subject: Pesticide Products; Receipt of Applications to Register New Uses; Correction - OPP-2012-0012

After reviewing the document that you sent to us, the document that was sent to the FR, and the document that was published, we have determined that the mistakes were made at the Register. Therefore, they will be correcting their mistakes (3 errors) as cited in your Correction document. We have been in touch with the Register and they have agreed to publish a correction. When they have a publication date they will call me and I will pass that date on to you. If you have any questions, let me know.

Jackie Garrett,  
Regulatory Coordination Staff  
(202) 566-1598

\*Personal privacy information\*



## Decision Information for 62719-AUO

Decision Seq: **457755**    Action Code: **R311, NEW PRODUCT; APPLICANT-INITIATED 2; EXCLUDES AP**

FFS Start Date: **07-Dec-2011**    Tentative Int: **No**    FFS Original Decision: **...**

Due Date: **07-Dec-2012**    75-Day Due Date: **...**    FFS EUP Decision: **...**

OPP Target Due Dt: **...**    21-Day Screen Dt: **07-Dec-2011**    FFS Primary Decision: **...**

Negotiated Due Dt: **...**    Start/Stop Clock    FGPA Clock: **...**

Registrant: **...**    Days Elapsed: **...**

Response Due Date: **...**

Current Status: **PENDING (16-Nov-2011)**

**Decision Status**

Tracking

Create Resubmission

FFS Letters

Valuer Documentation

Action Code History

Secondary Decision

Decision Comments

Meetings & Milestones

Decision Ownership

Payment

FFS Information

Receipts

Unmatched Payments

FFS Negotiated Due Dates

Data Package

75 Day Letters

OPP Target Due Date

Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S: 907067	Walsh, Michael	62719-AUO	07-Dec-2012	PENDING

EIS Sub # 2523

Viewing Record 1 of 1

(R311) due 12/7/12

12/2/11

Hi, Mike, (included in action)

This has a pending inert, which is in PV's branch for review under [REDACTED]

Jacket being transferred  
12/2/11

This is another Drego 3-2,4-D product.

Thanks,  
Kay



To: "Fonseca, Diego (D)" <dfonseca@dow.com>  
Cc:  
Bcc:  
Subject: 62719-AUO - deficiencies

Hi, Diego,

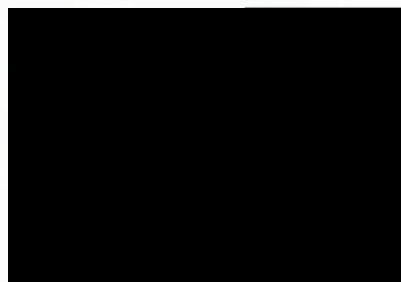
Your CSF submitted with this application still has problems with the inert ingredients. Both the basic and the revised alternate # 1 contain a surfactant that has not yet been cleared [REDACTED]

[REDACTED]. Please contact me as soon as possible for additional details. The 21-day PRIA screening date for this application is December 7. If you cannot rectify the deficiencies before that date, we will have to return your application to you, and retain 25% of the PRIA fee.

Best Regards,  
Kay

Kathryn V. Montague  
Product Manager 23  
OSCPP/OPP/RD/HB  
1200 Pennsylvania Ave., NW  
Mailcode 7505P  
Washington, DC 20460  
Phone: (703)305-1243

OK - This is an R311, which  
includes review/approval  
of inert.



w/ PV's  
branch

due 12/7/12

\*Inert ingredient information may be entitled to confidential treatment\*



RE: 62719-AUO. Data matrix legibility issue.  
Hipsky, Kerri (KA) to: Michael Walsh

12/08/2011 03:47 PM

Great, thank you again!

-Kerri

-----Original Message-----

From: Walsh.Michael@epamail.epa.gov [mailto:Walsh.Michael@epamail.epa.gov]  
Sent: Thursday, December 08, 2011 3:33 PM  
To: Hipsky, Kerri (KA)  
Subject: RE: 62719-AUO. Data matrix legibility issue.

Thanks Kerry.

Everything will be sent to the science groups tomorrow morning for their review.

From: "Hipsky, Kerri (KA)" <KAHipsky@dow.com>  
To: Michael Walsh/DC/USEPA/US@EPA  
Cc: "Fonseca, Diego (D)" <dfonseca@dow.com>  
Date: 12/08/2011 03:00 PM  
Subject: RE: 62719-AUO. Data matrix legibility issue.

Please see attached. Thank you!

-Kerri

-----Original Message-----

From: Walsh.Michael@epamail.epa.gov [mailto:Walsh.Michael@epamail.epa.gov]  
Sent: Thursday, December 08, 2011 2:55 PM  
To: Hipsky, Kerri (KA)  
Subject: RE: 62719-AUO. Data matrix legibility issue.

Yes. Please send them via email.

Thanks.

From: "Hipsky, Kerri (KA)" <KAHipsky@dow.com>  
To: Michael Walsh/DC/USEPA/US@EPA  
Date: 12/08/2011 02:46 PM  
Subject: RE: 62719-AUO. Data matrix legibility issue.

Mike, may I email these two pages to you? Thank you!

-----Original Message-----

From: Walsh.Michael@epamail.epa.gov [mailto:Walsh.Michael@epamail.epa.gov]  
Sent: Thursday, December 08, 2011 2:39 PM  
To: Fonseca, Diego (D)  
Subject: RE: 62719-AUO. Data matrix legibility issue.

Hi Diego. It looks like there was some type of scanning problem where pages 15 & 16 were stuck together when scanned.

Providing pages 15 & 16 should do it.

Thanks.

-Mike

From:	"Fonseca, Diego (D)"
<dfonseca@dow.com>	
To:	Michael
Walsh/DC/USEPA/US@EPA	
Cc:	"Hipsky, Kerri (KA)"
<KAHipsky@dow.com>	
Date:	12/08/2011 02:17 PM
Subject:	RE: 62719-AUO. Data
matrix legibility	
issue.	

Thanks Mike. Do you need a new CD containing the whole 62719-AUO data submitted? Perhaps you only need the two pages (15 and 16) with legibility problems? Please let me know to proceed right away. Regards,

Diego Fonseca  
Regulatory  
Office: 317 337-4693  
Fax: 317 337-4649  
dfonseca@dow.com

-----Original Message-----

From: Walsh.Michael@epamail.epa.gov [mailto:Walsh.Michael@epamail.epa.gov]  
Sent: Thursday, December 08, 2011 11:39 AM  
To: Fonseca, Diego (D)  
Subject: 62719-AUO. Data matrix legibility issue.

Hi Diego.

I received the new product registration package dated November 1, 2011 for 62719-AUO / GF-2726.

Please note that pages 15 and 16 of the data matrix are not legible on the version provided to me and the version in our e-submission system.



Please provide the complete legible data submission to me as soon as possible since this new product requires HED and TRB Chemistry and Toxicology review.

Thank you for your prompt attention to this matter.

-Mike

Michael Walsh  
Registration Division, Herbicide Branch  
Office of Pesticide Programs  
U.S. EPA

[attachment "GF-2726 Data Matrix - Pgs 15-16.PDF" deleted by Michael Walsh/DC/USEPA/US]





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

November 18, 2011

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

OPP Decision Number: D-457755  
EPA File Symbol or Registration Number: 62719-AUO  
Product Name: GF-2726  
EPA Receipt Date: 16-Nov-2011  
EPA Company Number: 62719  
Company Name: DOW AGROSCIENCES LLC

JOHN R. FITT, JR.  
DOW AGROSCIENCES LLC  
9330 ZIONSVILLE RD 308/2E  
INDIANAPOLIS, IN 46268-1054

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R311  
NEW PRODUCT;APPLICANT-INITIATED 2;EXCLUDES APPROVAL OF SAFENERS;  
REQUIRES APPROVAL OF NEW FOOD-USE INERT;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "m/30".

Front End Processing Staff  
Information Technology & Resources Management Division

## Hipsky, Kerri (KA)

---

**From:** Wiley, Tracey (TR)  
**Sent:** Monday, October 31, 2011 3:34 PM  
**To:** Hipsky, Kerri (KA)  
**Cc:** FAGUSRG  
**Subject:** FW: Pay.Gov Payment Confirmation

P2E

-----Original Message-----

**From:** [paygovadmin@mail.doc.twai.gov](mailto:paygovadmin@mail.doc.twai.gov) [<mailto:paygovadmin@mail.doc.twai.gov>]  
**Sent:** Monday, October 31, 2011 3:33 PM  
**To:** Wiley, Tracey (TR)  
**Subject:** Pay.Gov Payment Confirmation

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

### Transaction Summary

Application Name: PRIA Service Fees  
Pay.gov Tracking ID: 254R900H  
Agency Tracking ID: 74251010835  
Transaction Type: Sale  
Transaction Date: Oct 31, 2011 3:33:13 PM

Account Holder Name: Tracey Wiley  
Transaction Amount: \$17,133.00  
Billing Address: State Regulatory  
Billing Address 2: 9330 Zionsville Road  
City: Indianapolis  
State/Province: IN  
Zip/Postal Code: 462681054  
Country: USA  
Card Type: Visa  
Card Number: \*\*\*\*\*4335

Decision Number:  
Registration Number:  
Company Name: Dow AgroSciences LLC  
Company Number: 62719  
Action Code: R311

*Cover letter*

308/2E  
November 1, 2011



Document Processing Desk (APPL/E-SUB/REGFEE)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-XXX  
APPLICATION FOR NEW REGISTRATION - SECTION 3

Dow AgroSciences is respectfully submitting an application for new registration of GF-2726, which is an end-use herbicide product. As part of this new registration, we are citing the following own studies previously submitted to EPA:

<u>MRID No.</u>	<u>Study Title</u>
48289802	Group B-Physical/Chemical Properties for GF-2726
48289803	Acute Oral Toxicity Up And Down Procedure in Rats
48289804	Acute Dermal Toxicity Study in Rats
48289805	Acute Inhalation Toxicity Study in Rats
48289806	Primary Eye Irritation Study in Rabbits
48289807	Primary Skin Irritation Study in Rabbits
48289808	GF-2726: Local Lymph Node Assay in CBA/J Mice
48260702	A Nature of the Residue Study
48260703	A Nature of the Residue Study
48260704	Magnitude of the Residue
48260705	2,4-Dichlorophenol: Relevance for 2,4-D Treated Corn

We believe this registration action qualifies as a *PRIA action R311, \$17,133, New product; requires approval of new food-use inert; applicant-initiated; excludes approval of safeners*. A complimentary copy of the Pay.gov Payment Confirmation has been included (Pay.gov Tracking ID: 254R900H; Agency Tracking ID: 74251010835)

Dow AgroSciences is submitting this submission electronically (e-PRISM.xml New Section 3 for GF-2726).

Contents of Submission

Volume No.  
Volume I

Administrative Contents

- Transmittal document (this letter)
- Complimentary Copy: Pay.gov Payment Confirmation
- EPA Form 8570-1, Application for Pesticide.
- EPA Form 8570-27 for EPA Reg. No. [REDACTED]
- EPA Form 8570-27 for EPA Reg. No. [REDACTED]

\*Product ingredient source information may be entitled to confidential treatment\*

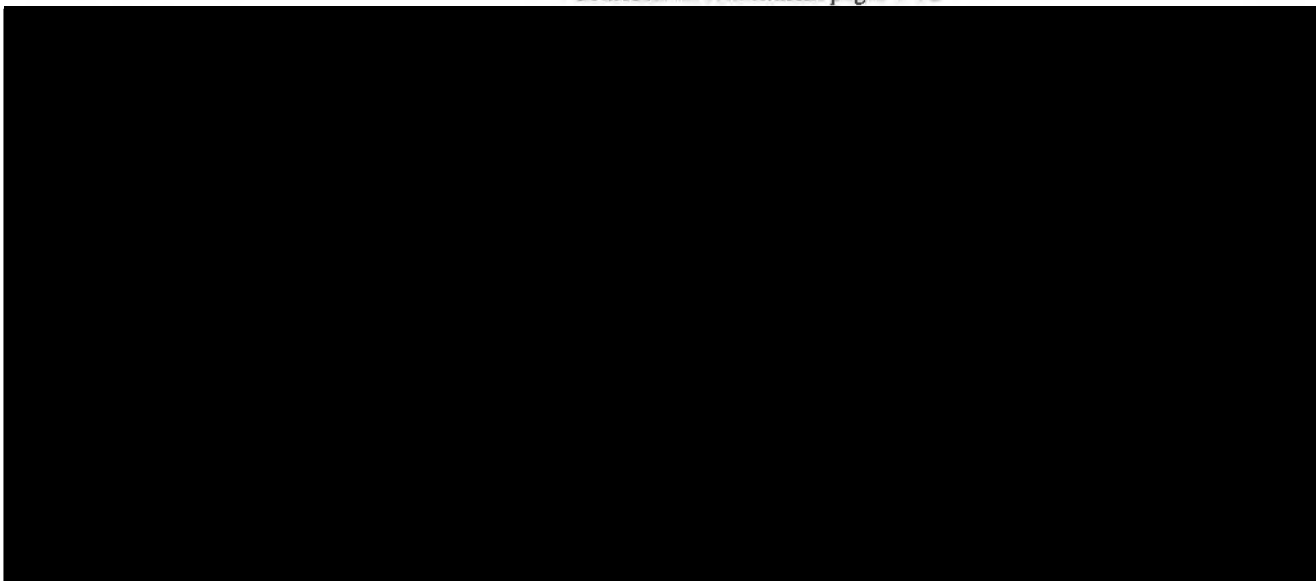
KATHRYN MONTAGUE/PM-23  
GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-XXX  
APPLICATION FOR NEW REGISTRATION - SECTION 3  
NOVEMBER 1, 2011

Page 2

- EPA Form 8570-27 for EPA Reg. No. [REDACTED]
- EPA Form 8570-34, Certification with Respect to Citation of Data
- EPA Form 8570-35, Data Matrix – Agency Copy (16 Pages)
- EPA Form 8570-35, Data Matrix – Public File Copy (16 Pages)
- Notice of Filing document (NOF)
- Complimentary Copy of [REDACTED] Letter of Authorization
- Basic Confidential Statement of Formula entitled GF-2726 dated September 12, 2011 (3 pages)
- Alternate #1 Confidential Statement of Formula entitled GF-2726 dated September 12, 2011 (3 pages)
- Label for GF-2726 entitled 062719-XXXXXX.20111031.GF-2726-XXX14Oct11d.pdf (21 pages plus Registration Notes)
- CD containing e-PRISM.xml – New Section 3

Volume Number	MRID No.	Contents
Volume #2 (830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800)	<u>48644101</u>	Title: Group A-Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method for GF-2726, an End Use Product Containing Glyphosate DMA and 2,4-D Choline Salts Author: Tank, Holger Study ID: NAFST-11-271 Report Date: September 12, 2011  Pages: 1-68 Confidential Attachment pages 1-72

(1 PDF Copy)

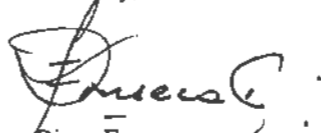


KATHRYN MONTAGUE/PM-23  
GF-2726 (AI: 2,4-D AND GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-XXX  
APPLICATION FOR NEW REGISTRATION - SECTION 3  
NOVEMBER 1, 2011

Page 3

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Stacy Frank, Regulatory Specialist at 317-337-5635 (slfrank@dow.com).

Sincerely,



Diego Fonseca  
Regulatory Leader - Regulatory Affairs  
317-337-4693 ✓  
317-337-4649 (FAX)  
dfonseca@dow.com

Enclosures

DF/kh



C. H. B. M.

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060

Print Form



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-XXX <b>ALLO</b>	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/GF-2726	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This action is for a proposed new Section 3 registration for GF-2726, the active ingredients of 2,4-D and Glyphosate. This action is a new product; requires approval of new food-use inert; applicant-initiated; excludes approval of safeners.. This action is EPA PRIA No. R311, fee \$17,133.

### Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 gal, 55 gal		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Diego Fonseca	Title Regulatory Leader	Telephone No. (Include Area Code) (317)337-4693
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Leader	
4. Typed Name Diego Fonseca (dfonseca@dow.com)	5. Date November 1, 2011	

62719 - ALLO





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Dow AgroSciences LLC, 9330 Zionsville Road, Indianapolis, IN 46268; 317-337-4693	EPA Registration Number/File Symbol 62719-XXX
Active Ingredient(s) and/or representative test compound(s) 2,4-D and Glyphosate	Date November 1, 2011
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food crop use	Product Name GF-2726

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

{Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements}

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

11/01/11

Typed or Printed Name and Title

Diego Fonseca, Regulatory Leader



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	EPA File Symbol/Registration Number <b>62719-XXX</b>
	Product Name <b>GF-2726</b>
	Date of Confidential Statement of Formula (EPA Form 8570-4) <b>09/12/2011</b>

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

**2,4-D + Glyphosate DMA 62%**

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
N-(phosphonomethyl)glycine		
Signature 	Name and Title <b>Diego Fonseca, Regulatory Manager</b>	Date <b>11/01/2011</b>

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA  
Copy 2 - Applicant copy

\*Product ingredient source information may be entitled to confidential treatment\*



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	EPA File Symbol/Registration Number 62719-XXX
	Product Name GF-2726
	Date of Confidential Statement of Formula (EPA Form 8570-4) 09/12/2011

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

2,4-D + Glyphosate DMA 62%

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
N-(phosphonomethyl)glycine		
Signature 	Name and Title Diego Fonseca, Regulatory Manager	Date 11/01/2011

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA  
Copy 2 - Applicant copy

\*Product ingredient source information may be entitled to confidential treatment\*







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 1 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
	GF-2726 (62719-XXX)				
830.1550	Product Identity and composition	48644101	62719	OWN	Submitted 11/01/11
830.1600	Description of materials used to produce the product	48644101	62719	OWN	Submitted 11/01/11
830.1670	Description of formation of impurities	48644101	62719	OWN	Submitted 11/01/11
830.1750	Certified Limits	48644101	62719	OWN	Submitted 11/01/11
830.1800	Enforcement analytical method	48644101	62719	OWN	Submitted 11/01/11
860.1550	Proposed Tolerances	48644103	62719	OWN	Submitted 11/01/11
870.2600	Skin sensitization	48644104	62719	OWN	Submitted 11/01/11
2,4-D Technical (62719-24, 62719-25) / Generic					
830.1550	Product Identity and composition	41055801	62719	OWN	
830.1550	Product Identity and composition	41055802	62719	OWN	
830.1550	Product Identity and composition	41055804	62719	OLD	
830.1550	Product Identity and composition	41055805	62719	OLD	
830.1600	Description of materials used to produce the product	41055801	62719	OWN	
830.1600	Description of materials used to produce the product	41055804	62719	OLD	
830.1620	Description of production process	41055801	62719	OWN	
830.1650	Description of formulation process	N/A FOR TECH			
830.1670	Description of formation of impurities	41055801	62719	OWN	
830.1670	Description of formation of impurities	41973501	62719	OLD	
830.1700	Preliminary analysis	41055805	62719	OLD	
830.1700	Preliminary analysis	43777502	62719	OWN	
830.1750	Certified Limits	41055804	62719	OLD	
Signature:	Name and Title: Diego Fonseca, Global Regulatory Manager Dow AgroSciences LLC			Date: November 1, 2011	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 2 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX				
Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
830.1750	Certified Limits	43777502	62719	OWN
830.1800	Enforcement analytical method	41055802	62719	OWN
830.6302	Color	41055803	62719	OWN
830.6303	Physical state	41055803	62719	OWN
830.6304	Odor	41055803	62719	OWN
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	41055803	62719	OWN
830.6314	Oxidizing or reducing action	41973501	62719	OWN
830.6315	Flammability	N/A FOR TECH ?		
830.6316	Explosibility	41973501	62719	OWN
830.6317	Storage stability of product	WAIVED	62719	OWN
830.6319	Miscibility	N/A FOR TECH ?		
830.6320	Corrosion characteristics	WAIVED	62719	OWN
830.6321	Dielectric breakdown voltage	N/A FOR TECH ?		
830.7000	pH of water solutions or suspensions	N/A FOR TECH ?		
830.7050	UV/Visible absorption	44543504	62719	OWN
830.7100	Viscosity	N/A FOR TECH ?		
830.7200	Melting point/melting range	41055803	62719	OLD
830.7200	Melting point/melting range	41973501	62719	OWN
830.7220	Boiling point/boiling range	N/A FOR TECH		
830.7300	Density/relative density	41055803	62719	OWN
830.7300	Density/relative density	47290627	62719	OWN
830.7370	Dissociation constant in water	41055803	62719	OWN
830.7550	Partition coefficient (n-octanol/water), shake flask method	41055803	62719	OWN
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	N/A FOR TECH		
830.7840	Water solubility: column elution method, shake flask method	41055803	62719	OWN
830.7860	Water solubility: generator column method	N/A FOR TECH		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 3 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
830.7950	Vapor pressure	41055803	62719	OWN	
870.1100	Acute oral toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.1200	Acute dermal toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.1300	Acute inhalation toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2400	Acute eye irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2500	Acute dermal irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2600	Skin sensitization	47392101	62719	OWN	
71-1	Acute Avian Oral Toxicity (LD50) in Bobwhite Quail or Mallard Duck	41158303	62719	OLD	
71-2(a)	Avian Dietary LC50 (bobwhite)	41158305	62719	OLD	
71-2(b)	Avian Dietary LC50 (mallard)	41158304	62719	OLD	
72-1(b)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41158306	62719	OLD	
72-1(c)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41737303	62719	OLD	
72-1(d)	Fish Tox Rainbow	41158306	62719	OLD	
072-2(a)	Invertebrate Toxicity Freshwater LC50	41158312	62719	OLD	
072-2(b)	Invertebrate Toxicity Freshwater LC50	41835207	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 4 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726			
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835205	62719	OLD	
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835201	62719	OLD	
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835202	62719	OLD	
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835204	62719	OLD	
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD	
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835206	62719	OLD	
72-3(d)	Acute LC50 Estuarine and Marine Organisms (fish)	41835202	62719	OLD	
72-3(e)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835201	62719	OLD	
72-3(f)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD	
72-4(a)	Early Life Stage in Fish	41737305	62719	OLD	
72-4(b)	Life Cycle in Aquatic Invertebrates (Daphnia/Mysid)	41835207	62719	OLD	
081-1	Acute Oral Toxicity in the Rat	44725301	62719	OLD	
081-2	Acute Dermal Toxicity	44734201	62719	OLD	
081-3	Acute Inhalation Toxicity in the Rat	44725302	62719	OLD	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 5 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
081-3	Acute Inhalation Toxicity in the Rat	163712	62719	OLD	
081-4	Primary Eye Irritation in the Rabbit	44725303	62719	OLD	
081-5	Primary Dermal Irritation	44734202	62719	OLD	
081-6	Dermal Sensitization	163713	62719	OLD	
081-6	Dermal Sensitization	44725304	62719	OLD	
82-1(a)	90-Day Feeding Study in the Rodent (rat)	41896701	62719	OLD	
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780003	62719	OLD	
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780005	62719	OLD	
82-2	21-Day Dermal	41735302	62719	OLD	
82-2	21-Day Dermal	41735305	62719	OLD	
83-3(a)	Teratogenicity in the Rat	42304601	62719	OLD	
83-3(a)	Teratogenicity in the Rat	42304602	62719	OLD	
83-3(h)	Teratogenicity in the Rabbit	42304603	62719	OLD	
83-3(b)	Teratogenicity in the Rabbit	42304604	62719	OLD	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 6 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
84-2(a)	Gene Mutation	41409803	62719	OLD	
084-2(b)	Structural Chromosome Aberration	41420005	62719	OLD	
84-2(b)	Structural Chromosome Aberration	41409806	62719	OLD	
84-4	Other Genotoxic Effects	41870103	62719	OLD	
84-4	Other Genotoxic Effects	41409809	62719	OLD	
085-1	General Metabolism	142119	62719	OLD	
85-1	General Metabolism	42261801	62719	OLD	
123-I(a)	Seed Germination/Seedling Emergence	42449201	62719	OLD	
123-I(a)	Seed Germination/Seedling Emergence	42772902	62719	OLD	
123-I(a)	Seed Germination/Seedling Emergence	43526901	62719	OLD	
850.4250	Seed Germination/Seedling Emergence	42416802	62719	OLD	
123-I(b)	Vegetative Vigor	42416801	62719	OLD	
123-I(b)	Vegetative Vigor	42172905	62719	OLD	
123-I(b)	Vegetative Vigor	42343902	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 7 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
123-1(b)	Vegetative Vigor	42772904	62719	OLD
123-2	Aquatic Plant Growth	41735202	62719	OLD
123-2	Aquatic Plant Growth	41735203	62719	OLD
123-2	Aquatic Plant Growth	41735204	62719	OLD
123-2	Aquatic Plant Growth	41735205	62719	OLD
123-2	Aquatic Plant Growth	41735206	62719	OLD
141-1	Honey Bee Acute Contact (LD50)	44517301	62719	OLD
141-1	Honey Bee Acute Contact (LD50)	44517302	62719	OLD
161-1	Hydrolysis	42735401	62719	OLD
161-1	Hydrolysis	42770501	62719	OLD
161-1	Hydrolysis	42770502	62719	OLD
161-2	Photodegradation in Water	42749702	62719	OLD
161-3	Photodegradation in Soil	Waived	62719	OLD
161-4	Photodegradation in Air	Waived	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 6 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX				
Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
162-1	Acrobic Soil Metabolism Study	43415901	62719	OLD
162-2	Acrobic Soil Metabolism Study	Waived	62719	OLD
162-3	Anaerobic Aquatic Metabolism Study	43691001	62719	OLD
162-4	Acrobic Aquatic Metabolism Study	Waived	62719	OLD
163-1	Leach/Adsorption/Desorption	Waived	62719	OLD
163-2	Lab Volatility Study	42059601	62719	OLD
163-3	Volatility - field	Waived	62719	OLD
164-1	Soil Field Dissipation Study	43514601	62719	OLD
164-1	Soil Field Dissipation Study	43542801	62719	OLD
164-1	Soil Field Dissipation Study	43640601	62719	OLD
164-1	Soil Field Dissipation Study	43705202	62719	OLD
164-1	Soil Field Dissipation Study	43762401	62719	OLD
164-1	Soil Field Dissipation Study	43762402	62719	OLD
164-1	Soil Field Dissipation Study	43762403	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 9 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX				
Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
164-1	Soil Field Dissipation Study	43762404	62719	OLD
164-1	Soil Field Dissipation Study	43533401	62719	OLD
164-1	Soil Field Dissipation Study	43831701	62719	OLD
164-1	Soil Field Dissipation Study	43831702	62719	OLD
164-1	Soil Field Dissipation Study	43849102	62719	OLD
164-1	Soil Field Dissipation Study	43864001	62719	OLD
164-1	Soil Field Dissipation Study	43872703	62719	OLD
164-1	Soil Field Dissipation Study	43914701	62719	OLD
164-3	Forestry Field Dissipation	44603101	62719	OWN
164-3	Forestry Field Dissipation	43908303	62719	OLD
164-3	Forestry Field Dissipation	43927101	62719	OLD
171-4	Magnitude of Residue in Irrigated Crops	43356302	62719	OLD
171-4(a)	Nature of Residue in Plants (Potato)	42423101	62719	OLD
171-4(a)	Nature of Residue in Plants (Wheat)	42439701	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 10 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send this form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726			
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
171-4(a)	Nature of Residue in Plants (Wheat)	42615601	62719	OLD	
171-4(a)	Nature of Residue in Plants (Potato)	43496101	62719	OLD	
171-4(b)	Nature of Residue in Plants (Potato)	Waived	62719	OLD	
860.1340	Residue Analytical Method (Plants)	46293601	959857	PL	
171-4(c)	Residue Analytical Method (Plants)	43691101	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43289301	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43665201	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43592101	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43610802	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43669801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43676801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43693701	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43697801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43709701	62719	OLD	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 11 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
171-4(c)	Residue Analytical Method (Plants)	43779501	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43779503	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43797901	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	44190301	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	44190302	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	44024801	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	40881401	PL	PL
171-4(e)	Storage Stability	43809901	62719	OLD
171-4(e)	Storage Stability	44603101	62719	OWN
171-4(k)	Magnitude of Residue Corn, Field	43676801	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779501	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779503	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43610802	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43592101	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 12 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product:	GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
N/A	DEREK Structure Activity Relationship Toxicity Endpoint Assessment for 2,6-Dichlorophenylacetic Acid (CAS 6575-24-2)	46454401	62719	OLD
N/A	Error Only Response to the Environmental Fate and Effects Division's Risk Assessment for the Reregistration Eligibility	46201801	62719	OLD
N/A	Error Only Response to Health Effects Division's Risk Assessment for the Reregistration Eligibility Decision (RED) For	46253601	959857	PL
N/A	Lack of Relevance of Toxicology Findings in Dogs for Assessment of Potential Human Health Risks of 2,4-D: A White	45861201	62719	OWN
N/A	Evaluation of Potential Aggregate Human Health Risks Associated with Agricultural and Consumer Uses of 2,4-D	46349601	62719	OWN
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Green Lake, Minnesota	45931801	62719	OWN
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Lake Woodruff, Florida	45897101	62719	OWN
N/A	Hydrolysis of 2,4-Dichlorophenoxyacetic Acid-2-Butoxyethyl Ester To 2,4-Dichlorophenoxyacetic Acid in A Soil/Water	41353701	62719	OWN
N/A	Comparative Inter-Species Pharmacokinetics of Phenoxyacetic acid Herbicides and Related Organic Acids	46328601	62719	OWN
N/A	Association Between Canine Malignant Lymphoma Living in Industrial Area and Use of Chemical by Dog Owners	45516101	62719	OWN
CITE-ALL			Industry Task Force II on 2,4-D Research Data	OWN
CITE-ALL			959857	PL
CITE-ALL			Agricultural Re-Entry Task Force	OWN
CITE-ALL			Endangered Species Task Force	OWN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 13 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX				
Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
CITE-ALL			Outdoor Residential Exposure Task Force	OWN
CITE-ALL			Spray Drift Task Force	PER
	Glyphosate DMA 62% Technical (62719-554) / Generic			
830.1550	Product Identity and Composition	46730701	62719	OWN
830.1600	Description of Materials Used to Produce the Product	46730701	62719	OWN
830.1620	Description of Production Process	46730701	62719	OWN
830.1670	Discussion of Formation of Impurities	46730701	62719	OWN
830.1750	Certified Limits	46730701	62719	OWN
830.1800	Enforcement Analytical Method	46730701	62719	OWN
830.1700	Preliminary Analysis	46730702	62719	OWN
830.6302	Color	46730703	62719	OWN
830.6303	Physical State	46730703	62719	OWN
830.6304	Odor	46730703	62719	OWN
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	46816106	62719	PER
830.6314	Oxidation/Reduction: Chemical Incompatibility	46730703	62719	OWN
830.6315	Flammability	46730703	62719	OWN
830.6316	Explosibility	46730703	62719	OWN
830.6317	Storage Stability	47204902	62719	OWN
830.6320	Corrosion Characteristics	47204902	62719	OWN
830.7000	pH	46730703	62719	OWN
830.7100	Viscosity	46730703	62719	OWN
830.7300	Density/Relative Density/Bulk Density	46730703	62719	OWN
N/A	Determination of Dissociation of Glyphosate DMA Salt	46730704	62719	OWN
870.1100	Acute Oral Tox	46730705	62719	OWN



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 14 of 15

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

## DATA MATRIX

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
870.1200	Acute Dermal Tox	46730706	62719	OWN
870.1300	Acute Inhalation Tox	46730707	62719	OWN
	Acute Eye Irritation	46730708	62719	OWN
870.2500	Acute Dermal Irritation	46730709	62719	OWN
870.2600	Skin Sensitization	46730710	62719	OWN
N/A	Dow AgroSciences LLC Proposal for the Addition of the Dimethylamine Salt to the List of Acceptable Salt Forms Listed in the Established Tolerance of Glyphosate (40 CFR 180.364)	46747101	62719	OWN
71-1	Acute Avian Oral Tox	00108204	524	Old
71-2(a)	Avian Dietary Tox	00076492	524	Old
71-2(b)	Avian Dietary Tox	00108107	524	Old
71-4(a)	Avian Reproduction	00108207	524	Old
71-4(b)	Avian Reproduction	00111953	524	Old
71-3	Wild Mammal Acute Tox	00067039	524	Old
72-1	Fish Acute Tox, Freshwater and Marine	00136339	524	Old
72-1	Fish Acute Tox, Freshwater and Marine	00108205	524	Old
72-1	Fish Acute Tox, Freshwater and Marine	44125705	33660	Per
72-1	Fish Acute Tox, Freshwater and Marine	44125704	33660	Per
72-2	Aquatic Invertebrate Acute Tox, Freshwater Daphnids	00108172	524	Old
72-2	Aquatic Invertebrate Acute Tox, Freshwater Daphnids	44125706	33660	Per
72-3	Mysid Acute Tox	00108110	524	Old
72-3	Mysid Acute Tox	00108111	524	Old
72-5	Fish Life Cycle Toxicity	00108171	524	Old
81-1	Acute Oral Tox	44142104	33660	Per
81-1	Acute Oral Tox	44125707	33660	Per
81-2	Acute Dermal Tox	44142105	33660	Per
81-2	Acute Dermal Tox	44257902	33660	Per





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 15 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX				
Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726	
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
81-3	Acute Inhalation Tox	44142106	33660	Per
81-4	Acute Eye Irritation	44142107	33660	Per
81-4	Acute Eye Irritation	00077236	524	Old
81-5	Acute Dermal Irritation	44142108	33660	Per
81-5	Acute Dermal Irritation	44257901	33660	Per
81-6	Skin Sensitization	44142109	33660	Per
81-6	Skin Sensitization	44257903	33660	Per
81-6	Skin Sensitization	44257902	33660	Per
82-1	Repeated Dose 28-Day Oral Tox in Rodents	44621800	33660	Per
82-1	Repeated Dose 28-Day Oral Tox in Rodents	44125709	33660	Per
82-1	Subchronic Rodent Oral Toxicity, 90-Day	44125708	33660	Per
82-1	Subchronic Rodent Oral Toxicity, 90-Day	00093879	524	Old
83-3	Prenatal Development Tox	00046363	524	Old
83-3	Prenatal Development Tox	00046362	524	Old
83-4	Reproduction and Fertility Effects	00105995	524	Old
84-2	Gene Mutation/Structural Chromosome Abberation	44621800	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	44125711	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	44125710	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	00078620	524	Old
84-2	Gene Mutation/Structural Chromosome Abberation	00078619	524	Old
122-1	Terrestrial Plant Tox, Tier I (Seedling Emergence)	44125712	33660	Per
123-1	Seed Germination/Root Elongation Tox	44125715	33660	Per
123-1	Seed Germination/Root Elongation Tox	45045101	33660	Per
122-2	Aquatic Plant Tox Using <i>Lemna</i> spp., Tiers I and II	44125714	33660	Per
122-2	Aquatic Plant Tox Using <i>Lemna</i> spp., Tiers I and II	44125713	33660	Per
141-1	Honey Bee Acute Contact Toxicity	00026489	524	Old
163-1	Leaching and Adsorption / Desorption	00108192	524	Old
163-1	Leaching and Adsorption / Desorption	00108140	524	Old





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 16 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>
163-1	Leaching and Adsorption / Desorption	00076493	524	Old
164-1	Dissipation Field Studies - Soil	44621800	33660	Per
162-3	Anaerobic Aquatic Metabolism	44621801	33660	Per
162-3	Anaerobic Aquatic Metabolism	44621800	33660	Per
162-3	Anaerobic Aquatic Metabolism	44124718	33660	Per
164-1	Dissipation Field Studies - Soil	44422201	33660	Per
164-1	Dissipation Field Studies - Soil	44125719	33660	Per
161-1	Hydrolysis as a Function of pH and Temperature	00108192	524	Old
161-2	Photodegradation in Water	44621800	33660	Per
161-2	Photodegradation in Water	44125716	33660	Per
162-1	Aerobic Soil	44621800	33660	Per
162-1	Aerobic Soil	44125717	33660	Per



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 1 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
	GF-2726 (62719-XXX)				
830.1550	Product Identity and composition	48644101	62719	OWN	Submitted 11/01/11
830.1600	Description of materials used to produce the product	48644101	62719	OWN	Submitted 11/01/11
830.1670	Description of formation of impurities	48644101	62719	OWN	Submitted 11/01/11
830.1750	Certified Limits	48644101	62719	OWN	Submitted 11/01/11
830.1800	Enforcement analytical method	48644101	62719	OWN	Submitted 11/01/11
860.1550	Proposed Tolerances	48644103	62719	OWN	Submitted 11/01/11
870.2600	Skin sensitization	48644104	62719	OWN	Submitted 11/01/11
	2,4-D Technical (62719-24, 62719-25) / Generic				
830.1550	Product Identity and composition	41055801	62719	OWN	
830.1550	Product Identity and composition	41055802	62719	OWN	
830.1550	Product Identity and composition	41055804	62719	OLD	
830.1550	Product Identity and composition	41055805	62719	OLD	
830.1600	Description of materials used to produce the product	41055801	62719	OWN	
830.1600	Description of materials used to produce the product	41055804	62719	OLD	
830.1620	Description of production process	41055801	62719	OWN	
830.1650	Description of formulation process	N/A FOR TECH			
830.1670	Description of formation of impurities	41055801	62719	OWN	
830.1670	Description of formation of impurities	41973501	62719	OLD	
830.1700	Preliminary analysis	41055805	62719	OLD	
830.1700	Preliminary analysis	43777502	62719	OWN	
830.1750	Certified Limits	41055804	62719	OLD	
Signature:			Name and Title: Diego Fonseca, Global Regulatory Manager Dow AgroSciences LLC		Date: November 1, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 2 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of the collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
830.1750	Certified Limits	43777502	62719	OWN	
830.1800	Enforcement analytical method	41055802	62719	OWN	
830.6302	Color	41055803	62719	OWN	
830.6303	Physical state	41055803	62719	OWN	
830.6304	Odor	41055803	62719	OWN	
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	41055803	62719	OWN	
830.6314	Oxidizing or reducing action	41973501	62719	OWN	
830.6315	Flammability	N/A FOR TECH			
830.6316	Explosibility	41973501	62719	OWN	
830.6317	Storage stability of product	WAIVED	62719	OWN	
830.6319	Miscibility	N/A FOR TECH			
830.6320	Corrosion characteristics	WAIVED	62719	OWN	
830.6321	Dielectric breakdown voltage	N/A FOR TECH			
830.7000	pH of water solutions or suspensions	N/A FOR TECH			
830.7050	UV/Visible absorption	44543504	62719	OWN	
830.7100	Viscosity	N/A FOR TECH			
830.7200	Melting point/melting range	41055803	62719	OLD	
830.7200	Melting point/melting range	41973501	62719	OWN	
830.7220	Boiling point/boiling range	N/A FOR TECH			
830.7300	Density/relative density	41055803	62719	OWN	
830.7300	Density/relative density	47290627	62719	OWN	
830.7370	Dissociation constant in water	41055803	62719	OWN	
830.7550	Partition coefficient (n-octanol/water), shake flask method	41055803	62719	OWN	
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	N/A FOR TECH			
830.7840	Water solubility: column elution method, shake flask method	41055803	62719	OWN	
830.7860	Water solubility: generator column method	N/A FOR TECH			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 3 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
830.7950	Vapor pressure	41055803	62719	OWN
870.1100	Acute oral toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.1200	Acute dermal toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.1300	Acute inhalation toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.2400	Acute eye irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.2500	Acute dermal irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.2600	Skin sensitization	47392101	62719	OWN
71-1	Acute Avian Oral Toxicity (LD50) in Bobwhite Quail or Mallard Duck	41158303	62719	OLD
71-2(a)	Avian Dietary LC50 (bobwhite)	41158305	62719	OLD
71-2(b)	Avian Dietary LC50 (mallard)	41158304	62719	OLD
72-1(b)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41158306	62719	OLD
72-1(c)	Freshwater Fish LC50 (preferably rainbow and bluegill)	41737303	62719	OLD
72-1(d)	Fish Tox Rainbow	41158306	62719	OLD
072-2(a)	Invertebrate Toxicity Freshwater LC50	41158312	62719	OLD
072-2(b)	Invertebrate Toxicity Freshwater LC50	41835207	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 4 of 15

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX				
Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835205	62719	OLD
72-3(a)	Acute LC50 Estuarine and Marine Organisms (fish)	41835201	62719	OLD
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835202	62719	OLD
72-3(b)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835204	62719	OLD
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD
72-3(c)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835206	62719	OLD
72-3(d)	Acute LC50 Estuarine and Marine Organisms (fish)	41835202	62719	OLD
72-3(e)	Acute LC50 Estuarine and Marine Organisms (mollusk)	41835201	62719	OLD
72-3(f)	Acute LC50 Estuarine and Marine Organisms (shrimp)	41835203	62719	OLD
72-4(a)	Early Life Stage in Fish	41737305	62719	OLD
72-4(b)	Life Cycle in Aquatic Invertebrates (Daphnia/Mysid)	41835207	62719	OLD
081-1	Acute Oral Toxicity in the Rat	44725301	62719	OLD
081-2	Acute Dermal Toxicity	44734201	62719	OLD
081-3	Acute Inhalation Toxicity in the Rat	44725302	62719	OLD





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 5 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
081-3	Acute Inhalation Toxicity in the Rat	163712	62719	OLD	
081-4	Primary Eye Irritation in the Rabbit	44725303	62719	OLD	
081-5	Primary Dermal Irritation	44734202	62719	OLD	
081-6	Dermal Sensitization	163713	62719	OLD	
081-6	Dermal Sensitization	44725304	62719	OLD	
82-1(a)	90-Day Feeding Study in the Rodent (rat)	41896701	62719	OLD	
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780003	62719	OLD	
82-1(b)	90-Day Feeding Study in the Non-Rodent (dog)	42780005	62719	OLD	
82-2	21-Day Dermal	41735302	62719	OLD	
82-2	21-Day Dermal	41735305	62719	OLD	
83-3(a)	Teratogenicity in the Rat	42304601	62719	OLD	
83-3(a)	Teratogenicity in the Rat	42304602	62719	OLD	
83-3(h)	Teratogenicity in the Rabbit	42304603	62719	OLD	
83-3(b)	Teratogenicity in the Rabbit	42304604	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 6 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
84-2(a)	Gene Mutation	41409803	62719	OLD	
084-2(b)	Structural Chromosome Aberration	41420005	62719	OLD	
84-2(b)	Structural Chromosome Aberration	41409806	62719	OLD	
84-4	Other Genotoxic Effects	41870103	62719	OLD	
84-4	Other Genotoxic Effects	41409809	62719	OLD	
085-1	General Metabolism	142119	62719	OLD	
85-1	General Metabolism	42261801	62719	OLD	
123-1(a)	Seed Germination/Seedling Emergence	42449201	62719	OLD	
123-1(a)	Seed Germination/Seedling Emergence	42772902	62719	OLD	
123-1(a)	Seed Germination/Seedling Emergence	43526901	62719	OLD	
850.4250	Seed Germination/Seedling Emergence	42416802	62719	OLD	
123-1(b)	Vegetative Vigor	42416801	62719	OLD	
123-1(b)	Vegetative Vigor	42172905	62719	OLD	
123-1(b)	Vegetative Vigor	42343902	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 7 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137D, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
123-1(b)	Vegetative Vigor	42772904	62719	OLD	
123-2	Aquatic Plant Growth	41735202	62719	OLD	
123-2	Aquatic Plant Growth	41735203	62719	OLD	
123-2	Aquatic Plant Growth	41735204	62719	OLD	
123-2	Aquatic Plant Growth	41735205	62719	OLD	
123-2	Aquatic Plant Growth	41735206	62719	OLD	
141-1	Honey Bee Acute Contact (LD50)	44517301	62719	OLD	
141-1	Honey Bee Acute Contact (LD50)	44517302	62719	OLD	
161-1	Hydrolysis	42735401	62719	OLD	
161-1	Hydrolysis	42770501	62719	OLD	
161-1	Hydrolysis	42770502	62719	OLD	
161-2	Photodegradation in Water	42749702	62719	OLD	
161-3	Photodegradation in Soil	Waived	62719	OLD	
161-4	Photodegradation in Air	Waived	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 8 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
162-1	Aerobic Soil Metabolism Study	43415901	62719	OLD
162-2	Aerobic Soil Metabolism Study	Waived	62719	OLD
162-3	Anaerobic Aquatic Metabolism Study	43691001	62719	OLD
162-4	Aerobic Aquatic Metabolism Study	Waived	62719	OLD
163-1	Leach/Adsorption/Desorption	Waived	62719	OLD
163-2	Lab Volatility Study	42059601	62719	OLD
163-3	Volatility - field	Waived	62719	OLD
164-1	Soil Field Dissipation Study	43514601	62719	OLD
164-1	Soil Field Dissipation Study	43542801	62719	OLD
164-1	Soil Field Dissipation Study	43640601	62719	OLD
164-1	Soil Field Dissipation Study	43705202	62719	OLD
164-1	Soil Field Dissipation Study	43762401	62719	OLD
164-1	Soil Field Dissipation Study	43762402	62719	OLD
164-1	Soil Field Dissipation Study	43762403	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 9 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
164-1	Soil Field Dissipation Study	43762404	62719	OLD	
164-1	Soil Field Dissipation Study	43533401	62719	OLD	
164-1	Soil Field Dissipation Study	43831701	62719	OLD	
164-1	Soil Field Dissipation Study	43831702	62719	OLD	
164-1	Soil Field Dissipation Study	43849102	62719	OLD	
164-1	Soil Field Dissipation Study	43864001	62719	OLD	
164-1	Soil Field Dissipation Study	43872703	62719	OLD	
164-1	Soil Field Dissipation Study	43914701	62719	OLD	
164-3	Forestry Field Dissipation	44603101	62719	OWN	
164-3	Forestry Field Dissipation	43908303	62719	OLD	
164-3	Forestry Field Dissipation	43927101	62719	OLD	
171-4	Magnitude of Residue in Irrigated Crops	43356302	62719	OLD	
171-4(a)	Nature of Residue in Plants (Potato)	42423101	62719	OLD	
171-4(a)	Nature of Residue in Plants (Wheat)	42439701	62719	OLD	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 10 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
	Ingredient: 2,4-D + Glyphosate		Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
171-4(a)	Nature of Residue in Plants (Wheat)	42615601	62719	OLD	
171-4(a)	Nature of Residue in Plants (Potato)	43496101	62719	OLD	
171-4(b)	Nature of Residue in Plants (Potato)	Waived	62719	OLD	
860.1340	Residue Analytical Method (Plants)	46293601	959857	PL	
171-4(c)	Residue Analytical Method (Plants)	43691101	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43289301	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43665201	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43592101	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43610802	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43669801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43676801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43693701	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43697801	62719	OLD	
171-4(c)	Residue Analytical Method (Plants)	43709701	62719	OLD	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 11 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
171-4(c)	Residue Analytical Method (Plants)	43779501	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43779503	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	43797901	62719	OLD
171-4(c)	Residue Analytical Method (Plants)	44190301	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	44190302	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	44024801	62719	OWN
171-4(c)	Residue Analytical Method (Plants)	40881401	PL	PL
171-4(e)	Storage Stability	43809901	62719	OLD
171-4(c)	Storage Stability	44603101	62719	OWN
171-4(k)	Magnitude of Residue Corn, Field	43676801	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779501	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43779503	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43610802	62719	OLD
171-4(k)	Magnitude of Residue Range, Grasses	43592101	62719	OLD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 12 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137D), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
N/A	DEREK Structure Activity Relationship Toxicity Endpoint Assessment for 2,6-Dichlorophenylacetic Acid (CAS 6575-24-2)	46454401	62719	OLD	
N/A	Error Only Response to the Environmental Fate and Effects Division's Risk Assessment for the Reregistration Eligibility	46201801	62719	OLD	
N/A	Error Only Response to Health Effects Division's Risk Assessment for the Reregistration Eligibility Decision (RED) For	46253601	959857	PL	
N/A	Lack of Relevance of Toxicology Findings in Dogs for Assessment of Potential Human Health Risks of 2,4-D: A White	45861201	62719	OWN	
N/A	Evaluation of Potential Aggregate Human Health Risks Associated with Agricultural and Consumer Uses of 2,4-D	46349601	62719	OWN	
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Green Lake, Minnesota	45931801	62719	OWN	
N/A	Dispersion and Dissipation of the Herbicide 2,4-D in Lake Woodruff, Florida	45897101	62719	OWN	
N/A	Hydrolysis of 2,4-Dichlorophenoxyacetic Acid-2-Butoxyethyl Ester To 2,4-Dichlorophenoxyacetic Acid in A Soil/Water	41353701	62719	OWN	
N/A	Comparative Inter-Species Pharmacokinetics of Phenoxyacetic acid Herbicides and Related Organic Acids	46328601	62719	OWN	
N/A	Association Between Canine Malignant Lymphoma Living in Industrial Area and Use of Chemical by Dog Owners	45516101	62719	OWN	
CITE-ALL			Industry Task Force II on 2,4-D Research Data	OWN	
CITE-ALL			959857	PL	
CITE-ALL			Agricultural Re-Entry Task Force	OWN	
CITE-ALL			Endangered Species Task Force	OWN	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 13 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
CITE-ALL			Outdoor Residential Exposure Task Force	OWN	
CITE-ALL			Spray Drift Task Force	PER	
	Glyphosate DMA 62% Technical (62719-554) / Generic				
830.1550	Product Identity and Composition	46730701	62719	OWN	
830.1600	Description of Materials Used to Produce the Product	46730701	62719	OWN	
830.1620	Description of Production Process	46730701	62719	OWN	
830.1670	Discussion of Formation of Impurities	46730701	62719	OWN	
830.1750	Certified Limits	46730701	62719	OWN	
830.1800	Enforcement Analytical Method	46730701	62719	OWN	
830.1700	Preliminary Analysis	46730702	62719	OWN	
830.6302	Color	46730703	62719	OWN	
830.6303	Physical State	46730703	62719	OWN	
830.6304	Odor	46730703	62719	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	46816106	62719	PER	
830.6314	Oxidation/Reduction: Chemical Incompatibility	46730703	62719	OWN	
830.6315	Flammability	46730703	62719	OWN	
830.6316	Explosibility	46730703	62719	OWN	
830.6317	Storage Stability	47204902	62719	OWN	
830.6320	Corrosion Characteristics	47204902	62719	OWN	
830.7000	pH	46730703	62719	OWN	
830.7100	Viscosity	46730703	62719	OWN	
830.7300	Density/Relative Density/Bulk Density	46730703	62719	OWN	
N/A	Determination of Dissociation of Glyphosate DMA Salt	46730704	62719	OWN	
870.1100	Acute Oral Tox	46730705	62719	OWN	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 14 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
870.1200	Acute Dermal Tox	46730706	62719	OWN	
870.1300	Acute Inhalation Tox	46730707	62719	OWN	
	Acute Eye Irritation	46730708	62719	OWN	
870.2500	Acute Dermal Irritation	46730709	62719	OWN	
870.2600	Skin Sensitization	46730710	62719	OWN	
N/A	Dow AgroSciences LLC Proposal for the Addition of the Dimethylamine Salt to the List of Acceptable Salt Forms Listed in the Established Tolerance of Glyphosate (40 CFR 180.364)	46747101	62719	OWN	
71-1	Acute Avian Oral Tox	00108204	524	Old	
71-2(a)	Avian Dietary Tox	00076492	524	Old	
71-2(b)	Avian Dietary Tox	00108107	524	Old	
71-4(a)	Avian Reproduction	00108207	524	Old	
71-4(b)	Avian Reproduction	00111953	524	Old	
71-3	Wild Mammal Acute Tox	00067039	524	Old	
72-1	Fish Acute Tox, Freshwater and Marine	00136339	524	Old	
72-1	Fish Acute Tox, Freshwater and Marine	00108205	524	Old	
72-1	Fish Acute Tox, Freshwater and Marine	44125705	33660	Per	
72-1	Fish Acute Tox, Freshwater and Marine	44125704	33660	Per	
72-2	Aquatic Invertebrate Acute Tox, Freshwater Daphnids	00108172	524	Old	
72-2	Aquatic Invertebrate Acute Tox, Freshwater Daphnids	44125706	33660	Per	
72-3	Mysid Acute Tox	00108110	524	Old	
72-3	Mysid Acute Tox	00108111	524	Old	
72-5	Fish Life Cycle Toxicity	00108171	524	Old	
81-1	Acute Oral Tox	44142104	33660	Per	
81-1	Acute Oral Tox	44125707	33660	Per	
81-2	Acute Dermal Tox	44142105	33660	Per	
81-2	Acute Dermal Tox	44257902	33660	Per	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 15 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370), U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX				
Date: November 1, 2011		EPA Reg No.: 62719-XXX		
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268	Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
81-3	Acute Inhalation Tox	44142106	33660	Per
81-4	Acute Eye Irritation	44142107	33660	Per
81-4	Acute Eye Irritation	00077236	524	Old
81-5	Acute Dermal Irritation	44142108	33660	Per
81-5	Acute Dermal Irritation	44257901	33660	Per
81-6	Skin Sensitization	44142109	33660	Per
81-6	Skin Sensitization	44257903	33660	Per
81-6	Skin Sensitization	44257902	33660	Per
82-1	Repeated Dose 28-Day Oral Tox in Rodents	44621800	33660	Per
82-1	Repeated Dose 28-Day Oral Tox in Rodents	44125709	33660	Per
82-1	Subchronic Rodent Oral Toxicity, 90-Day	44125708	33660	Per
82-1	Subchronic Rodent Oral Toxicity, 90-Day	00093879	524	Old
83-3	Prenatal Development Tox	00046363	524	Old
83-3	Prenatal Development Tox	00046362	524	Old
83-4	Reproduction and Fertility Effects	00105995	524	Old
84-2	Gene Mutation/Structural Chromosome Abberation	44621800	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	44125711	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	44125710	33660	Per
84-2	Gene Mutation/Structural Chromosome Abberation	00078620	524	Old
84-2	Gene Mutation/Structural Chromosome Abberation	00078619	524	Old
122-1	Terrestrial Plant Tox, Tier I (Seedling Emergence)	44125712	33660	Per
123-1	Seed Germination/Root Elongation Tox	44125715	33660	Per
123-1	Seed Germination/Root Elongation Tox	45045101	33660	Per
122-2	Aquatic Plant Tox Using <i>Lemna</i> spp., Tiers I and II	44125714	33660	Per
122-2	Aquatic Plant Tox Using <i>Lemna</i> spp., Tiers I and II	44125713	33660	Per
141-1	Honey Bee Acute Contact Toxicity	00026489	524	Old
163-1	Leaching and Adsorption / Desorption	00108192	524	Old
163-1	Leaching and Adsorption / Desorption	00108140	524	Old



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Page 16 of 16

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (21370, U.S. Environmental Protection Agency, 401 M. Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX					
Date: November 1, 2011		EPA Reg No.: 62719-XXX			
Registrant's Name & Address:	Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268		Product: GF-2726		
Ingredient: 2,4-D + Glyphosate	Chemical: 030001 for 2,4-D Chemical: 103608 for Glyphosate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
163-1	Leaching and Adsorption / Desorption	00076493	524	Old	
164-1	Dissipation Field Studies - Soil	44621800	33660	Per	
162-3	Anaerobic Aquatic Metabolism	44621801	33660	Per	
162-3	Anaerobic Aquatic Metabolism	44621800	33660	Per	
162-3	Anaerobic Aquatic Metabolism	44124718	33660	Per	
164-1	Dissipation Field Studies - Soil	44422201	33660	Per	
164-1	Dissipation Field Studies - Soil	44125719	33660	Per	
161-1	Hydrolysis as a Function of pH and Temperature	00108192	524	Old	
161-2	Photodegradation in Water	44621800	33660	Per	
161-2	Photodegradation in Water	44125716	33660	Per	
162-1	Aerobic Soil	44621800	33660	Per	
162-1	Aerobic Soil	44125717	33660	Per	





# PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 11-16-11

Experts In-Processing Signature: MF Harrington Date 11-18-11 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date                     

EPA Reg. Number: <u>62719-AUO</u>		EPA Receipt Date: <u>11-16-11</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to <a href="http://www.epa.gov/opprd001/inerts/">http://www.epa.gov/opprd001/inerts/</a> ), including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
			X			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (link to <a href="http://www.epa.gov/oppfead1/labeling/lrm/">http://www.epa.gov/oppfead1/labeling/lrm/</a> ) (Electronic labels on CD are encouraged and guidance is available)( link to <a href="http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels">http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels</a> )			X		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X		
8	Notice of Filing (link to <a href="http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm">http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm</a> ) included with petitions (link to <a href="http://www.epa.gov/pesticides/regulating/tolerances.htm">http://www.epa.gov/pesticides/regulating/tolerances.htm</a> )			X
9	If applicable for conventional applications, reduced risk rationale (link to <a href="http://www.epa.gov/opprd001/workplan/reducedrisk.html">http://www.epa.gov/opprd001/workplan/reducedrisk.html</a> )			X
10	Required Data (link to <a href="http://www.epa.gov/pesticides/regulating/data_requirements.htm">http://www.epa.gov/pesticides/regulating/data_requirements.htm</a> ) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			



Comments:

Inerts not approved for food use under  
40 CFR 180.9120 pre-harvest application



Jacket Fa.1 [ESF not approved]  
8b-5 Pass

FG/AB

NRLO 486441

\* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/opprd001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to [http://www.epa.gov/oppbppd1/biopesticides/contacts\\_bppd.htm](http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm)].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/opprd001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



EPA Reg. No. 62719-AUO / Product GF-2726

Fonseca, Diego (D)

to:

Fiker Getachew

11/30/2011 09:42 AM

Cc:

Sandra Rock

Hide Details

From: "Fonseca, Diego (D)" <dfonseca@dow.com>

To: Fiker Getachew/DC/USEPA/US@EPA

Cc: Sandra Rock/DC/USEPA/US@EPA

1 Attachment



Scan001.pdf

Dear Fiker, please find attached the new Alternate #1 CSF for GF-2726, dated 28-Nov-2011, which is being sent to replace the previous submitted version of Alternate #1 CSF, dated 12-Sep-2011. This new revised Alternate #1 CSF, does not include the surfactant: [REDACTED] which as per EPA communication, is not approved for food use under 40 CFR 180.920, pre-harvest application.

Let me know if you need to receive via mail, two hard copies of this new Alternate #1 CSF. Feel also free to contact me any time for any further information.

Regards,

**Diego Fonseca**

Regulatory

Office: 317 337-4693

Fax: 317 337-4649

dfonseca@dow.com





EPA Reg. No. 62719-AUO / Product GF-2726

Fonseca, Diego (D)

to:

Fiker Getachew

11/29/2011 10:54 AM

Hide Details

From: "Fonseca, Diego (D)" <dfonseca@dow.com>

To: Fiker Getachew/DC/USEPA/US@EPA

History: This message has been replied to.

2 Attachments



Dear Fiker.

As per our talk 5 minutes ago, please find attached the MSDS for [REDACTED] that were provided by [REDACTED] the manufacturer company. This information relates to EPA Reg. No. 62719-AUO / Product GF-2726

For any further additional information please don't hesitate to contact me.

**Diego Fonseca**

Regulatory

Office: 317 337-4693

Fax: 317 337-4649

dfonseca@dow.com

## Script for Rejection Phone calls

Contact Name: Stacy Frank

Phone #: 317-337-5635

Email: slfrank@dow.com

First Call/Initials: RG

Second Call/Initials:

Date: 11/23

Date:

Time: 9:30

Time:

This is Fiker Getachew, EPA contractor.

I'm calling regarding your submission in support of

62719-AUO (GIF 2726)

We have found the following deficiencies regarding PR Notice 86-5 compliance:


Volume/Study Title:

Volume/Study Title:

Volume/Study Title:

Volume/Study Title:

Additional Volumes continued on back of this page: Yes ☐ No ☒

 (Inert) is not approved for intended purpose

These deficiencies have been approved by EPA Contract Officer.

The corrections can be faxed to 703-305-5060/Attn: \_\_\_\_\_

### Second Call

If we do not receive the corrections by \_\_\_\_\_, we will process your submission accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.

\*Inert ingredient information may be entitled to confidential treatment\*

**Fee for Service**

{907067:~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies?      ☐ Fee Waiver?  
☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.    **23**

Receipt No.

S- **907067**

EPA File Symbol/Reg. No.

**62719-AUO**

Pin-Punch Date:

**11/16/2011**

☐ This item is NOT subject to FFS action.

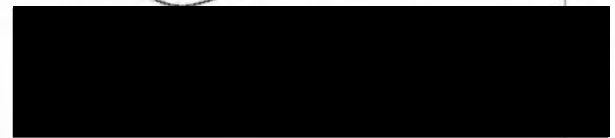
Action Code:

Requested: **R311**

Granted: **R311**

Amount Due: \$ **17,133.**

Parent/Child Decisions:



☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: **[Signature]**

Date: **11-18-11**

Remarks:

# INERT CLEARANCE STATUS FORM

Reviewer Name: Fiker Getachew		Request Date: 11/22/2011	
Tel: 703-305-6472	ISB	CUBE: S 4816	MAIL CODE:

## A. COMMENTS:

[REDACTED] - Registrant removed the inert and sent me a revised CSF. (See attached CSF's)

## B. PESTICIDE PRODUCT INFORMATION:

Receipt Number:	Date on CSF: 09/12/11	Food-Use Pesticide: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EPA Reg. No/File Symbol: 62719-AUO	Formulation: Basic	
Product Name: GF-27268Q		

## C. INGREDIENT INFORMATION:

Ingredient No.1	Tolerance Exemption(s) <sup>1</sup>					
	910	920	930	940	950	960
Chem. Name:						
Trade Name: [REDACTED]						
CAS Reg. No.: [REDACTED]						
Comments: The above inert is not found in the Agency database. Please provide full compositional information including the manufacturer, constituent names, CAS numbers, and weight/weight percent composition (100% full composition).						

Ingredient No. 2	Tolerance Exemption(s) <sup>1</sup>					
	910	920	930	940	950	960
Chem. Name:						
Trade Name: [REDACTED]						
CAS Reg. No.: [REDACTED]						
Comments: [REDACTED] is not approved for food use under 40 CFR 180.920, pre-harvest application.						

Reviewer Name: Fiker Getachew

Review Date: 11/23/11

<sup>1</sup>Language from the Code of Federal Regulations (40 CFR 180, subpart D):

40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.

This is an R3A - include the review of the inert pp.

\*Inert ingredient information may be entitled to confidential treatment\*

# INERT CLEARANCE STATUS FORM

Reviewer Name: Fiker Getachew		Request Date: 11/22/2011	
Tel: 703-305-6472	ISB	CUBE: S 4816	MAIL CODE:

## A. COMMENTS:

[REDACTED] - Registrant removed the inert and sent me a revised CSF. (See attached CSF's)

This is an R3A - include the review of the inert pp.

## B. PESTICIDE PRODUCT INFORMATION:

Receipt Number:	Date on CSF: 09/12/11	Food-Use Pesticide: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EPA Reg. No/File Symbol: 62719-AUO	Formulation: Basic	
Product Name: GF-27268Q		

## C. INGREDIENT INFORMATION:

Ingredient No.1	Tolerance Exemption(s) <sup>1</sup>					
	910	920	930	940	950	960
Chem. Name:						
Trade Name: [REDACTED]						
CAS Reg. No.: [REDACTED]						
Comments: The above inert is not found in the Agency database. Please provide full compositional information including the manufacturer, constituent names, CAS numbers, and weight/weight percent composition (100% full composition).						

### Ingredient No. 2

Ingredient No. 2	Tolerance Exemption(s) <sup>1</sup>					
	910	920	930	940	950	960
Chem. Name:						
Trade Name: [REDACTED]						
CAS Reg. No.: [REDACTED]						
Comments: [REDACTED] is not approved for food use under 40 CFR 180.920, pre-harvest application.						

Reviewer Name: Fiker Getachew

Review Date: 11/23/11

<sup>1</sup>Language from the Code of Federal Regulations (40 CFR 180, subpart D):

40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.

\*Inert ingredient information may be entitled to confidential treatment\*



